STATE OF GEORGIA

BEFORE THE

GEORGIA PUBLIC SERVICE COMMISSION

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

POST HEARING BRIEF OF GEORGIA POWER COMPANY

July 3, 2025

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

POST HEARING BRIEF OF GEORGIA POWER COMPANY

I. INTRODUCTION

The matters presently pending before the Georgia Public Service Commission (the "Commission") are Georgia Power Company's ("Georgia Power" or the "Company") 2025 Integrated Resource Plan ("IRP") in Docket No. 56002 and its 2025 Application for the Certification, Decertification, and Amended Demand Side Management Plan in Docket No. 56003 ("DSM Application").

For the reasons set forth herein, Georgia Power's request benefits all customers by preserving and protecting reliability and supporting the continued economic development of our state in an economical manner for all customers. Accordingly, the Commission should approve Georgia Power's 2025 IRP and DSM Application, as modified by recommendations included in Georgia Power's Rebuttal Testimony.

II. GEORGIA POWER 2025 IRP SUMMARY

The Commission should approve the Company's 2025 IRP and DSM Application because it represents a reasonable path to ensuring that Georgia Power can continue to serve its existing and growing customer base with the reliability that customers value and expect, while continuing to support Georgia's growing and thriving economy. In addition to providing necessary capacity resources to support the Company's growing customer load and the state's growing economy, the 2025 IRP and DSM Application provide substantial protections and numerous benefits to all customers.

Consistent with prior IRPs, Georgia Power continues focusing on providing clean, safe, reliable, and affordable electric service to its more than 2.8 million customers. Serving customers and supporting a growing Georgia are key principles of the Company's integrated resource planning process, and Georgia Power is committed to maintaining reliability and affordability for all customers. In this IRP, the Company proposes necessary investments in its generation fleet and transmission system to ensure Georgia Power can continue to serve its customers with the reliability and resiliency they deserve and expect. The Company is also proposing innovative solutions that will enhance the value of customer programs and enable System-wide control of distributed energy resources ("DERs"), which will strengthen the capabilities of the electric system and help meet customers' evolving energy needs. With the Commission's constructive oversight, Georgia Power's long-term integrated resource planning process—and specifically, the requests set forth in this 2025 IRP—will help ensure the Company can continue to reliably and economically meet the electric energy needs of its customers and Georgia, today and for decades to come.

In addition, the Company's DSM plan offers a well-balanced portfolio of residential and commercial energy efficiency and demand response programs to reduce the Company's peak load and provide energy saving benefits to customers. The Company's IRP and DSM Application position the Company to effectively respond to a variety of economic, regulatory, and operational conditions in the coming years, and to continue to provide customers with clean, safe, reliable, and affordable electric service. For the reasons further set forth herein, the Company's IRP and DSM Application should be approved by this Commission.

III. PROCEDURAL HISTORY AND BACKGROUND

On January 31, 2025, Georgia Power filed its application for approval of the 2025 IRP in Docket No. 56002 as required by O.C.G.A. § 46-3A-2. (Tr. 106.) In conjunction with this filing, Georgia Power also filed its DSM Application in Docket No. 56003. The Commission issued a Procedural and Scheduling Order ("PSO") for the IRP on January 28, 2025. Pursuant to the PSO, on February 28, 2025, Georgia Power filed the Direct Testimony of Jeffrey R. Grubb, J. Randy Hubbert, M. Brandon Looney, Michael B. Robinson, and Francisco Valle in Docket Nos. 56002 and 56003; the Direct Testimony of Jennifer S. McNelly and Robert W. Mitchell, III in Docket Nos. 56002 and 56003; and the Direct Testimony of Dr. Ross Beppler, Carley Goff, A. Wilson Mallard, and Andy Phillips in Docket Nos. 56002 and 56003. (Tr. 110, 155, 187.) Georgia Power presented its direct case to the Commission in Docket Nos. 56002 and 56003 through hearings conducted March 25 through March 27, 2025 ("Direct Hearing").

On May 2, 2025, Intervenors filed testimony in Docket Nos. 56002 and 56003. Intervenor Advanced Power Alliance ("APA") filed the Testimony of Jeff Clark, Andy White, and Ryan Sanders in Docket Nos. 56002 and 56003. Intervenor Clean Energy Buyers Association ("CEBA")

filed the Testimony of Priya Barua and R. Brent Alderfer and the Testimony of Ted Thomas in Docket Nos. 56002 and 56003. Intervenor Capital Good Fund filed the Testimony of Russ Bates in Docket No. 56002. Intervenor Georgia WAND and Vote Solar filed the Testimony of Yunus Kinkhabwala in Docket Nos. 56002 and 56003. Intervenor Georgia Center for Energy Solutions ("GCES") filed the Testimony of Peter Hubbard in Docket Nos. 56002 and 56003. Intervenor Georgia Coalition of Local Governments ("GCLG") filed the Testimony of David A. Nifong and the Testimony of Blake F. Richetta in Docket Nos. 56002 and 56003. Intervenor Georgia Conservation Voters Education Fund ("GCVEF") filed the Testimony of Maria Roumpani in Docket Nos. 56002 and 56003. Intervenors Georgia Interfaith Power & Light ("GIPL") and Southface Energy Institute, Inc. ("Southface") filed the Testimony of Chelsea Hotaling; the Testimony of Anjali Patel; and the Testimony of Stacy Sherwood in Docket Nos. 56002 and 56003. Intervenor Georgia Solar Energy Association ("GA Solar") filed the Testimony of Olivia Amyette, Daniel Pertwee, and Adam Hoyt in Docket No. 56002. Intervenor Georgia Solar Energy Industries Association, Inc. ("GSEIA") filed the Testimony of Ani Backa, Tully Blalock, and Jonathan Roberts in Docket Nos. 56002 and 56003. Intervenors Natural Resources Defense Council ("NRDC"), Sierra Club, and Southern Alliance for Clean Energy ("SACE") (collectively, "NRDC, Sierra Club, & SACE") filed the Testimony of Derek Stenclik; the Testimony of Matthew Richwine; and the Testimony of AJ Goulding in Docket Nos. 56002 and 56003. Intervenor Southern Renewable Energy Association ("SREA") filed the Testimony of Alejandro Palomino in Docket No. 56002. Intervenor Walmart Inc. ("Walmart") filed the Testimony of Lisa V. Perry in Docket Nos. 56002 and 56003.

On May 5, 2025, the Commission's Public Interest Advocacy Staff ("PIA Staff") filed the Testimony of Robert L. Trokey, Dylan A. Drugan, and Karan A. Pol; the Testimony of Tom

Newsome, Philip Hayet, Anthony Sandonato, and Leah Wellborn; the Testimony of Jamie Barber, Nick Cooper, and Richard F. Spellman; the Testimony of Jamie Barber, John Kaduk, and Jeffrey D. Bower; the Testimony of Douglas A. Smith and Sasikumar Kannan; the Testimony of Michael S. Goggin; the Testimony of Robert R. Stephens; and the Testimony of Ralph C. Smith and Jason R. Forsythe in Docket Nos. 56002 and 56003. (Tr. 1418, 1605, 1853, 1912, 2042, 2068, 2233, 2517.) Hearings regarding the Direct Testimony of PIA Staff and Intervenors in Docket Nos. 56002 and 56003 were held May 27 through May 29, 2025 ("Staff/Intervenor Hearing").

On June 9, 2025, the Company filed the Rebuttal Testimony of Jeffrey R. Grubb, J. Randy Hubbert, M. Brandon Looney, Michael B. Robinson, and Francisco Valle in Docket Nos. 56002 and 56003, and the Rebuttal Testimony of Dr. Ross Beppler, Carley Goff, and A. Wilson Mallard, in Docket Nos. 56002 and 56003. (Tr. 4713, 5047.) Hearings regarding the Rebuttal Testimony of Georgia Power in Docket Nos. 56002 and 56003 were held June 23 through June 24, 2025 ("Rebuttal Hearing").

IV. ARGUMENT

The 2025 IRP establishes a comprehensive strategy to meet the forecasted energy needs of customers and the state as it continues to experience extraordinary growth. The Company proposes a reliable, economical, and diverse resource mix to meet Georgia's growing energy needs and provide clean, safe, reliable, and affordable electric service for its customers, all in a manner consistent with the public interest. O.C.G.A. § 46-3A-1(7). Through the 2025 IRP, Georgia Power reasonably forecasts customer demand and proposes cost effective solutions including unit extensions and upgrades to resources on the Georgia Power System to help address resulting capacity needs.

A. The Commission Should Approve the Company's Supply-Side Plan.

1. The Commission should approve the February 2025 Load and Energy Forecast as filed in Georgia Power's Rebuttal Testimony.

The Commission should approve the February 2025 Load and Energy Forecast as reasonable and appropriate in this case. As discussed below, Georgia Power presented significant evidence demonstrating that its Load and Energy Forecast is based on statistically sound methodology, informed by the most recent economic trends since the 2023 IRP Update and the initial filing of the 2025 IRP, and employs proven methods to evaluate the probability, level, and timing in which projected loads will materialize. To account for large loads in the Load and Energy Forecast, the Company appropriately adjusts the organic forecast using the Load Realization Model ("LRM"), which mirrors the approach employed in the 2023 IRP Update. (Tr. 124.)

Using Commission-approved long- and short-term methodologies, the Company's Load and Energy Forecast that was filed initially in this docket projected continued extraordinary customer load growth, far exceeding the demand projected in both the 2022 IRP and the 2023 IRP Update. (Tr. 122.) In this filing, the Company projected an increase in demand of more than 2,200 megawatts ("MW") through 2031 compared to the 2023 IRP Update. The substantial and empirical evidence associated with these projections consistently demonstrate that large loads are coming to the state of Georgia, a fact that PIA Staff witnesses do not dispute. (Tr. 1563 ("We certainly don't want to suggest that these large load projects or economic development is not coming to Georgia.").)

PIA Staff and Intervenors nevertheless criticize the Company's Load and Energy Forecast, placing undue emphasis on load removals without considering load additions and inappropriately extrapolating data from the Company's quarterly large load reports. The Company's Load and Energy Forecast uses up-to-date information informed by discussions with actual and potential

customers as well as the Company's experience with data center customers. Accordingly, the Company's Load and Energy Forecast should be adopted.

a) PIA Staff and Intervenors inappropriately emphasize load removals from Georgia Power's quarterly large load reports without considering load additions.

PIA Staff and certain Intervenors focus on the removals of load from the Company's LRM, arguing that the Company is overstating the load that is coming to Georgia. Specifically, PIA Staff's panel of Witnesses Trokey, Drugan, and Pol argue that the large load pipeline documents "numerous project removals and load reductions" and calls for modification to the assumptions of the LRM in light of the "significant rate of project removals and net load reductions." (Tr. 1481, 1482.) Similarly, GIPL/Southface Witness Hotaling describes the "Load Change," "Load Removed," and "Load Ramp Change" as part of her analysis of the large load quarterly reports submitted by the Company and ultimately provides recommendations around capturing the risk of certain customers dropping out of Georgia Power's load queue. (Tr. 3359.)

A focus on load removals fails to account for an equally, if not more, significant aspect of the LRM: load additions. For every reduction in load in the Company's LRM, there has been an equal or greater load increase. (*See* Tr. 298.) In fact, for every megawatt removed from the LRM, three megawatts get added to the pipeline. (*Id.*) In other words, load additions more than offset any load removals that PIA Staff and Intervenors focus on, and these load additions must be considered together with load removals. (Tr. 4725.) When load removals and additions are properly considered, the size of the large load pipeline shows continued growth, and this growth drives the Company's planning decisions, as detailed in this IRP. (Tr. 4725–26.)

Over emphasis of just the load removal component of the load forecast could lead to an under-forecasted load, causing the Company to have insufficient resources available to serve load,

which could in turn increase reliability risks for customers and force the Company either to shed load or make costly market purchases. (Tr. 4726.) Moreover, an under-forecasted load prevents the Company from effectively serving the economic load growth that is occurring in Georgia—load that PIA Staff does not dispute is coming to Georgia. (Tr. 1563.) Therefore, it is crucially important for the Company's Load and Energy Forecast to appropriately consider all aspects—load additions as well as load removals—to ensure accurate forecasts.

b) PIA Staff and GIPL/Southface inappropriately extrapolate data across quarterly reports, resulting in double counting of load trends.

PIA Staff and GIPL criticize the Company's use of data in the LRM. Specifically, PIA Staff's panel of Witnesses Trokey, Drugan, and Pol seek to require the Company to report on how it will evaluate and incorporate data from all prior LRM vintages into the current LRM. (Tr. 1429.) GIPL/Southface Witness Hotaling also criticizes the Company for allegedly failing to use new data from the Company's large load quarterly reports to update Company assumptions about how large load customers will behave and concludes that the large load model is not updated to reflect this new data (Tr. 3357), that the Company's growth assumptions are inaccurate (Tr. 3361), and that the Company's reliance on these allegedly inaccurate assumptions leads to an overstated load forecast. (Tr. 3367.) Witness Hotaling recommends that the Company's delay probability in the LRM should be modified to reflect data from the available quarterly load reports. (Tr. 3367.)

These witnesses fail to appreciate that the quarterly reports filed by the Company already provide the most up-to-date information each time they are filed. For every iteration of the quarterly report, the Company includes the latest information, and past information in previous quarterly reports becomes obsolete. (Tr. 4722.) Incorporating data from previous quarterly reports would double count data points and would most certainly lead to inaccurate conclusions. (*Id.*)

Therefore, the recommendation by PIA Staff witnesses Trokey, Drugan, and Pol to incorporate data produced from all prior LRM vintages into the current LRM is not only redundant but would also lead to fundamental inaccuracies in the data. Likewise, Witness Hotaling's recommendation to extrapolate and incorporate quarterly large load report data into the delay probability aspect of the LRM would also result in double counting of data points. These recommendations should be rejected by the Commission.

c) The Company's forecasting approach is a more reasonable estimation of the load it will be required to serve.

PIA Staff Witnesses Trokey, Drugan, and Pol identified only one adjustment to the Company's Load and Energy Forecast, which was an adjustment to one assumption within the LRM. Specifically, PIA Staff proposed to alter the materialization assumption for data center and cryptocurrency customer segments currently included in the LRM to align with the materialization assumption for other industry segments, effectively applying a uniform adjustment across all customer segments that reduces the Company's peak load forecast by 2,000 MW through 2032 (the "Uniform Adjustment"). (Tr. 1501.)

This Uniform Adjustment fails to account for more recent developments in the large load pipeline. As demonstrated in the record, the Company's large load pipeline has more than doubled, and the composition of the pipeline itself has also changed. (Tr. 4729–30.) As outlined in Exhibit 1 from Georgia Power's Rebuttal Testimony (Tr. 4773–83), the Company proactively refined model inputs based on these meaningful load pipeline developments. (Tr. 4730.) The Company's February 2025 adjustments are based on recent market insights to provide an updated perspective on new large loads. (Tr. 4732.) The Company revised its materialization assumptions to differentiate between the types of data center customers and shifted the commitment likelihood to

focus on a more definitive and binding stage of customer commitment. (Tr. 4732–33.) Using these adjustments, the Company then produced a new load forecast and updated its capacity needs, all of which are established in the record for the Commission's consideration. (*See* Tr. 4734, Fig. 2; Tr. 4735, Fig. 3.)

Despite having access to large load data through Q4 2024 and February 2025 that informed the Company's February sensitivity, PIA Staff witnesses made their Uniform Adjustment recommendation based on large load pipeline data through Q2 of 2024 only, which fails to account for more recent significant changes. (Tr. 4730.) Applying PIA Staff's Uniform Adjustment to the latest large load pipeline, as recommended by PIA Staff Witness Pol (*see* Tr. 4730–31), results in a large load forecast that is more than 2,250 MW greater than the Company's February 2025 sensitivity by 2030, and this difference continues to grow over time. (Tr. 4731.)

These more recent changes are not considered in PIA Staff's Uniform Adjustment; therefore, PIA Staff's Uniform Adjustment should be rejected. The Company's revised February 2025 sensitivity is rooted in the dynamic nature of the large load customer portfolio and addresses the need to evolve forecasting models to better reflect the latest available information. (Tr. 4732.) The Company incorporates complexities and uncertainties unique to data center customer behavior, which results in a more nuanced, accurate, and reliable forecast. (Tr. 4733.) Simply put, the Company's February 2025 adjustments are more appropriate than PIA Staff's proposed Uniform Adjustment.

Additionally, PIA Staff's Uniform Adjustment is based on a single-year snapshot of only three data center projects, all of which are still in active development. (Tr. 4723.) PIA Staff relied on this limited set of early load data to justify a significant change in the materialization assumption

for all data centers. (*Id.*) This small sample size of three projects does not justify such a significant change to materialization assumptions.

Moreover, the Company's assumptions around materialization of data center loads are based on the Company's significant experience with the operational characteristics and load factors of data centers through the more than 70 data centers currently on the Company's system. (Tr. 4723.) Given the lack of more mature data on large load materialization, this information is helpful to support the different assumptions used for data centers versus other industry segments. (Tr. 4724.) Accordingly, the Commission should reject PIA Staff's Uniform Adjustment to the materialization assumption in the LRM. However, the Company does agree that when an adequate sample size of mature projects becomes available, the LRM assumptions for all industry segments should be reevaluated going forward and adjusted, if needed. (Tr. 4723.)

2. Georgia Power's 26% Winter TRM and Proposed Summer TRM of 20% should be approved by the Commission, and PIA Staff and Intervenor recommendations to reduce the TRM should be rejected.

The Commission should approve the 26% Winter Target Reserve Margin ("TRM") value and Proposed Summer 20% TRM value as reasonable and appropriate for the 2025 IRP. Based on prior decisions by the Commission, the Company already plans to a 26% Winter TRM value, and that level should be approved. (Tr. 129.) The 20% Summer TRM value represents an increase from the currently approved 16.25% Summer TRM value. (*Id.*)

Because the Company uses the reserve margin for reliability planning purposes (Tr. 127), a lower TRM could lead to significant reliability concerns, an issue that is seeing real and major consequences around the country. For example, in May 2025, a regional transmission organization ordered utility load shedding in and around New Orleans to avoid blackouts due to increased customer demand, transmission constraints, and generation outages leading to an inability to serve

load. (Tr. 4737.) Further, during Winter Storm Elliott in December 2022, many Southeastem utilities were required to shed load, but Georgia Power was able to avoid shedding load due in part to its reserve margin. Finally, as noted during the Rebuttal Hearing the week of June 23, 2025, during hot summer temperatures, a number of regional utilities publicly asked customers to engage in energy conversation measures to avoid overburdening the power grid. (*See* Tr. 4840.) These occurrences all illustrate why sufficient reserve margins are essential to reliable service.

PIA Staff Witnesses Newsome, Hayet, Sandonato, and Wellborn contend that the Company's proposed 26% Winter TRM value is too high, alleging that (1) the Company's Load Forecast Error ("LFE") distribution is overstated; (2) the Company's data center load assumptions contributed to an overstated TRM; (3) the Company's cold weather data training models overstated weather-adjusted load for certain extremely low temperature conditions; and (4) the removal of a single month of cold weather would reduce the Winter TRM to less than 24%. (Tr. 1629–32.) PIA Staff's proposed LFE distribution is unreasonable, as demonstrated in the record. The LFE distributions of Santee Cooper, a utility whose LFE PIA Staff acknowledges is reasonable, and Georgia Power are similar in both shape and size. (Tr. 4742.) PIA Staff's recommended LFE distribution, on the other hand, is unreasonably narrow and unsupported. (*See* Tr. 4742.) Regarding data center load, the Company agrees that additional analysis would be beneficial and will continue to consider new and emerging data on that issue. As noted in Georgia Power's Main Panel Rebuttal Testimony, the Company is open to revising and refining its modeling approach if future developments warrant such adjustments, but only after additional information on the data center industry becomes available. (Tr. 4744.) The Company does not agree with reducing the reserve margin based on potential data center load patterns at this time. (*Id.*)

Regarding the final two recommendations, which relate to the inclusion of extreme temperature conditions, PIA Staff failed to justify why real, actual data should be ignored simply because it has a significant impact on the analysis. PIA Staff admits that such extreme temperatures are possible, and failed to explain why the Company should ignore such data when planning for reliable service to customers. (Tr. 4744–45.) It is reasonable to expect that a small subset of weather years will have a significant impact on the results of the Reserve Margin Study, and exclusion of this data simply shifts the reliability risk for customers to higher temperatures. (Tr. 4745.)

Notwithstanding PIA Staff's individual critiques of the Company's Reserve Margin Study, a reduction of the Company's Winter TRM to 24.5% should be rejected because the Company's proposed 26% margin is necessary to maintain reliability levels consistent with best utility practice, and to ensure Georgia Power does not have reliability levels lower than nearby states that Georgia competes with for economic development projects. The cost required to maintain a higher reserve margin is justified and reasonable in light of the significant costs that customers could otherwise incur from load shedding and large-scale blackouts—costs that do not necessarily appear on customer bills. (Tr. 4737.) Accordingly, the Company's Reserve Margin Study, along with the Company's recommended System long-term Winter TRM value of 26%, long-term Summer TRM value of 20%, and the short-term TRM values associated with each season, should be approved.

3. The Company's expansion planning modeling and Resource Mix Study are reasonable.

The Company's expansion planning analysis identifies the economically optimal mix of resources that reliably meets future capacity and energy demands across several different plausible planning scenarios. (*See* Exhibit GPC-1/PD at 195.) While this step of the planning process

provides a roadmap that helps inform long-term resource planning decisions, these plans do not represent a formal resource planning decision by the Company, nor are they finalized commitments for specific resources. (Exhibit GPC-1/PD at 195; *see also* Tr. 4746.) The Company procures supply-side resources through a Request for Proposals ("RFP") process, so the results of this analysis do not drive the Company's specific resource actions. (Tr. 4746.)

a) Consistent with industry standard, the Company's expansion plan modeling uses practical build limits that reflect the real and significant resource decisions that the Company will make.

Build limits are an important part of the Company's expansion planning process, as the Company's expansion plans are used to evaluate subsequent resource decisions. Therefore, it is important for the Company to assume practical and realistic build limits for all resources in its mix analysis. (Tr. 4747.)

Certain Intervenors argue that the Company's AURORA modeling program might seek to build more solar, wind, or other renewable resources if the build limits were relaxed. For example, GCVEF Witness Roumpani recommends a justification for annual build limits and recommends exploring conditions under which the limits could be relaxed, particularly for renewable energy and storage resources. (Tr. 2971, 3001, 3036.) GIPL/Southface Witness Hotaling expresses concerns about the Company's "restrictive build limits on solar" and recommends that Georgia Power present data without annual build limits applied to new solar resources. (Tr. 3398.) NRDC, Sierra Club, & SACE Witness Stenclik similarly recommends removing annual build limits on solar, wind, and storage in at least one unconstrained scenario to assess least-cost outcomes. (Tr. 4138.) He further recommends that the Company be required to justify how its build limits were developed and explain any changes to these build limits. (Tr. 4154, 4189.) Finally, SREA Witness Palomino alleges that the IRP does not discuss the drivers for the Company's annual build limits

and fails to elaborate on the reasons for wind and solar limits. (Tr. 4453.) Witness Palomino argues that when built capacity reaches the annual limit, "it suggests that the system has a greater appetite, and therefore economic incentive, to build wind and solar capacity than is permitted by Georgia Power's adopted constraints." (Tr. 4454.)

These Intervenor criticisms ignore the fact that the use of build limits in expansion planning modeling is standard industry practice and that build limits should reflect the real decisions the Company must make about significant resource decisions. Most electric utilities include build limit assumptions in their expansion plans as part of their integrated resource plans. (Tr. 4748.) Both Duke Energy Carolinas and Dominion Energy in Virginia—states cited in Intervenor testimony—each have resource build limits as parts of their respective resource mix studies. (*Id.*) While perhaps an interesting theoretical exercise, relying on unrealistic build limits that ignore practical realities of planning and operating an electric utility can have real and significant negative impacts, as the Resource Mix Study informs renewable energy procurement levels and projections of avoided energy costs used in RFP evaluations. (Tr. 4747.) Accordingly, any calls for relaxed build limits should be rejected, and the Company's industry practice of including reasonable and practical build limits should be approved.

b) The Company and PIA Staff reached the same conclusions even though the Company did not run an integrated analysis as suggested by PIA Staff.

PIA Staff's panel of Witnesses Newsome, Hayet, Sandonato, and Wellborn testified that "[a]lthough an economic analysis was performed in each of [the six different studies performed by the Company], the studies were not integrated." (Tr. 1695.) PIA Staff noted that "an integrated analysis would have allowed the Company to determine a project ranked order based on which incremental project would provide the most value to the system." (*Id.*) PIA Staff further testified

that it performed an integrated analysis that concurrently evaluated a host of resource decisions, options, and retirements. (Tr. 1696.) Despite this criticism, the Newsome, Hayet, Sandonato, and Wellborn panel reached very similar conclusions as Georgia Power regarding incremental resource additions. (Tr. 1844.) Thus, even without the use of an integrated analysis as PIA Staff has proposed, the outcome between the Company's analysis and PIA Staff's analysis was essentially the same. On this basis alone, the Company's analysis should be deemed reasonable.

PIA Staff's proposal to perform an integrated analysis also ignores the practical realities of the Company's planning circumstances. To perform an analysis using integrated model, all inputs must be ready in time to run the model, a fact that PIA Staff Witnesses Newsome, Hayet, Sandonato, and Wellborn acknowledged during hearings. (Tr. 1843.) PIA Staff has the benefit of receiving the Company's completed IRP before beginning its analysis and has all the Company's inputs already available to them for critique. (Tr. 1843.) In comparison, the Company has no such benefit—many of the Company's supporting studies are conducted sequentially because one study may rely on the outputs of a previously completed study. For example, the Company did not have (and in fact, could not have) the results of its All-Source RFP at the time it performed its Resource Mix Study. (Tr. 4749–50.) Despite this important fact, PIA Staff essentially recommends that the Company perform a complete analysis with missing information. (Tr. 4750.) And while PIA Staff suggests that the Company use surrogate information and later update such placeholder information (Tr. 1843), this would only add to the already complex and time-consuming nature of the IRP process. Because PIA Staff and the Company came to very similar conclusions despite the different approaches, the Company's economic analyses should be deemed reasonable.

c) Even if the Company assumed increased costs for generic CCs and CTs, an economically optimal mix of resources includes CC and CT resources.

As part of its Resource Mix Study, the Company assesses capital costs of generic resources, including costs of combined cycle ("CC") and combustion turbine ("CT") resources. (Tr. 136.) PIA Staff and some Intervenors testified that the Company's CC and CT costs used in the Resource Mix Study were lower than current market expectations, based on comparisons of the Company's costs to other electric utilities' costs for the same or similar technologies. (Tr. 4750.)

The Company has acknowledged that costs have increased for CC and CT resources due to higher global demand for these resources. (Tr. 513–14.) While the Company did not re-run the entire mix study to account for the higher costs of only one or two technologies, the Company did conduct a sensitivity with increased CC and CT costs consistent with costs highlighted in PIA Staff and Intervenor testimony. (*Id.*) The Company conducted this sensitivity analysis for both the MG0 and 111-MG0 scenarios (Tr. 4751), and in both analyses, CC and CT resources were all still part of an economically optimal mix of resources. While individual selections did vary, the CC and CT resources were still selected, even considering higher costs. This indicates that these resources still make up a significant portion of an economically optimal mix of resources and should be included in the Company's expansion planning, even with higher prices.

The Company will continue gathering information for both cost and performance for all generation technologies (not just CCs and CTs), will consider these as part of the Company's resource plans and analysis, and will continue to use actual information for specific resources to inform cost and performance for generation technologies. (Tr. 4753.) In light of the Company's sensitivities and its commitment to continued refinement of costs based on actual information, the Company's resource expansion planning should be adopted.

4. The Commission should approve the natural gas and nuclear upgrades as proposed and scheduled as these resources support optimization of existing resources for the economic benefit of customers.

The Commission should approve the Company's proposed nuclear and natural gas unit upgrades as proposed. These key components of Georgia Power's supply-side strategy leverage existing generation resources to meet growing energy demands. Georgia Power's comprehensive upgrade plan provides an additional 380 MW of reliable winter capacity at a lower cost than new construction. (Exhibit GPC-1/PD at 183, 188–90.)

By leveraging existing infrastructure, the proposed Plant McIntosh upgrades will increase capacity by 268 MW while simultaneously improving operational efficiency. (Tr. 139–41.) These investments will deliver substantial long-term benefits, including improved reliability and greater economic capacity, providing direct benefits to customers. (Tr. 139–40.) Similarly, the Commission should approve the Company's proposed nuclear Extended Power Uprates ("EPU"). The EPUs proposed for Plant Vogtle Units 1-2 and Plant Hatch Units 1-2 optimize existing nuclear facilities to produce additional baseload capacity without incurring significant incremental transmission system costs. (Tr. 140–41.) By increasing reactor thermal output, these upgrades will yield substantial, economical, carbon-free energy, bolstered by significant federal and state incentives, including Inflation Reduction Act-enabled Production Tax Credits and Georgia's Investment Tax Credits. (Tr. 141.)

a) Any lessons learned in upgrading Plant Vogtle are not transferrable to Plant Hatch and provide, at best, nominal benefit to customers.

PIA Staff recommends approving the nuclear upgrade projects at Plant Vogtle and Plant Hatch but recommends delaying the Plant Hatch project until two years after completion of the projects at Plant Vogtle. (Tr. 4755.) PIA Staff's recommendation to postpone Plant Hatch's upgrades relies on the unfounded assumption that operational experience gained from the upgrades

at Plant Vogtle would directly benefit later upgrades at Plant Hatch. It will not. As PIA Staff acknowledges, the reactors utilize different nuclear technologies, significantly minimizing any potential lessons learned. (Tr. 1836–37, 4755.) Further, PIA Staff's testimony that thermal side similarities mitigate these differences disregards the Company's extensive experience with projects on the secondary side of nuclear and non-nuclear thermal generating units in its fleet. (Tr. 1836–37, 4755–56.) The Company has already demonstrated the expertise required for the upgrades at both Plant Hatch and Plant Vogtle, rendering any incremental learning from either unit negligible and insufficient to justify delaying these economic and necessary upgrades. (Tr. 4755–56.)

b) The economic value of the proposed delay is wholly unsupported by evidence.

PIA Staff's proposed delay speculates that there would be customer benefits without considering the downsides. PIA Staff's preferred timeline would defer customer access to 58 MW of clean, cost-effective capacity from Plant Hatch by three years, directly undermining the economics of the projects. (Tr. 4756.) Notably, PIA Staff offers no quantitative analysis to substantiate the alleged benefits of the recommended delay. This lack of substantive analysis underscores the speculative and unsupported nature of PIA Staff's delay recommendation. In contrast, the record indicates that postponing these upgrades pushes benefits further into the future, shortening the overall duration of realized economic value, and increasing costs through inflation, extended financing, maintenance, tax credit applicability, and labor retention challenges. (*Id.*)

The recommendation to delay the nuclear upgrades at Plant Hatch contradicts PIA Staff's own mix study, which selects Plant Hatch in the first year that it is available using the Company's analysis—not after the proposed delay. (Tr. 1838–39.) Despite acknowledging the current economic viability of the project, PIA Staff disregards the economic detriments of a delay. (Tr.

1689, 4756.) PIA Staff does not provide quantifiable evidence to show lessons learned are worth the economic losses that would stem from a delay. The Commission should approve the Company's proposed unit upgrades without modification.

5. The Commission should approve Georgia Power's request to continue investment in its hydro modernization projects.

The Commission should approve Georgia Power's request to complete the hydro modernization projects on its remaining hydro fleet. Maintaining, investing, and operating these emission-free hydro resources will preserve 665 MW of capacity across nine hydroelectric facilities for the benefit of customers and will help maintain momentum achieved since the initial authorization in 2019. (Tr. 142.) The original modernization projects, approved by the Commission in the 2019 IRP, have already seen significant progress, successfully upgrading critical infrastructure and enhancing operational efficiency. (Tr. 141–42.) Approving the remaining hydro modernization projects now will avoid duplicative spending, streamline project management, and ensure the efficient and effective use of customer dollars. For these reasons, the Commission should approve Georgia Power's request without modification. (Tr. 4757–59.)

Although PIA Staff supports modernization of the hydro fleet, it recommends denying the Company's request and contends that further preliminary investigations and engineering studies should be completed before committing to comprehensive modernization. (Tr. 1692–94.) PIA Staff's recommendation is impractical, financially imprudent, and ultimately detrimental to customers. Although PIA Staff offers no substantive criticism of the Company's previously approved and executed modernization projects, it contends that the delay would provide time to evaluate the Company's performance on prior projects when considering the approval of future modernization work. (Tr. 1694.) This concern is unfounded. PIA Staff's proposal to delay

additional hydro modernizations projects until 2028 lacks a reasoned basis and would cause additional, unnecessary costs for customers. (Tr. 1692–94.)

Continued modernization of Georgia Power's hydroelectric facilities represents the least cost alternative for customers. The Company's cost-benefit analyses demonstrate that sustained investment in hydro modernization significantly outperforms other alternatives, such as dam removal or unit retrofit, from both financial and operational standpoints. (Tr. 4758–59.) PIA Staff's recommended delay fails to adequately account for economies of scale and the comprehensive efficiencies that are achievable through coordinated modernization efforts. (Tr. 4758.) The Company's approach not only preserves the longevity and reliability of existing hydro assets but does so at the lowest cost option for customers. (Tr. 4758–59.)

Moreover, PIA Staff's proposal to limit investment to preliminary investigations and engineering studies prior to committing to comprehensive hydro modernization is impractical and financially imprudent. Hydroelectric plants, by their nature, are uniquely site-specific, with individual turbines, infrastructure, and operational requirements differing substantially among facilities. (Tr. 4757.) Because the engineers design a custom replacement around the turbine, it must be procured prior to the commencement of any engineering work. (Tr. 4757–58.) Unlike other generation resources, any preliminary engineering performed before the procurement of equipment would not be usable, and the same work would likely need to be repeated after the equipment is actually procured. (Tr. 4758.) Such approach would unnecessarily front-load duplicative engineering and design expenses. (*Id.*)

Initial engineering and feasibility studies already undertaken by Georgia Power demonstrate sufficient planning and a clear pathway to successful project completion. Any perceived incremental benefits of additional preliminary studies, as suggested by PIA Staff, do not

justify their additional costs, particularly where delaying full modernization efforts would necessarily result in repeated expenditures for re-engineering and project management. In contrast, approval of the remaining hydro modernization projects avoids redundant spending, streamlines project management, and ensures that customer dollars are spent efficiently and effectively. For these reasons, the Commission should approve continued investment in the Company's hydro modernization program, as proposed in the IRP.

6. The Commission should approve the Company's proposed wholesale-to-retail offering from Plant Scherer Unit 3 without modification.

The Company seeks to certify approximately 187 MW of capacity from Plant Scherer Unit 3, offered in four wholesale blocks, and make this capacity available to the retail jurisdiction consistent with the Commission's previously approved Wholesale Action Plan. (Tr. 152–53.) If the Commission accepts the Company's offer of wholesale capacity, the Company also asks that it be certified. PIA Staff testified that this wholesale-to-retail offer was a "close call," and recommended that Blocks 1–3 should be the first additional resources procured, if the Commission decides to take more capacity than what PIA Staff recommends. They further recommend the consideration of Block 4 only if the Company agrees to certain conditions.

The Commission should approve the Company's request as proposed because these 187 MW provide a reliable source of capacity and energy from existing resources. (Tr. 154.) Additionally, the megawatts are included in retail rate base at a cost-effective market price during a time of capacity need. Further, the offer poses very little, if any, risk because the capacity associated with the proposal can be reliably deployed for retail use, comes with no construction risks, and requires no additional transmission projects. (Tr. 4772.) As the extension of Plant Scherer is economical, it is advantageous to maximize the megawatts associated with the unit to

serve customer capacity needs. Therefore, contrary to PIA Staff's recommendation, the Commission should acquire all four blocks in order to maximize economic and reliable capacity during a time of capacity and energy need. (*Id.*)

7. The Commission should approve the Company's proposed enhancements to the Utility Scale and distributed generation ("DG") RFPs.

The Commission should approve the Company's proposed Utility Scale and DG RFP enhancements as reasonable and appropriate in this proceeding. The proposed enhancements will improve processes and flexibility to create efficiencies and evolve the Company's procurement strategy. Specific to its Utility Scale procurements, Georgia Power proposes: (1) to implement flexible Required Commercial Operation Dates; and (2) to continue to consider the use of Transmission System operational tools and flexibility to support interconnection viability. (Tr. 5058.) For its DG procurements, the Company has proposed: (1) updating the Renewable Cost Benefit ("RCB") Framework to consider the locational value of a project to incentivize strategic siting; (2) to allow for battery energy storage to be included; and (3) to make the DG procured available for customer subscription and for additional resources to be procured if beneficial for customers. (*Id.*)

For both the DG and Utility Scale renewable procurements, Georgia Power proposes to offer a submission price refresh and extended RFP period if there are outstanding customer subscription needs. (Tr. 193–94.) In the submission price refresh process, fully evaluated but not selected proposals would be offered the opportunity to refresh their pricing in a manner that allows the project to deliver benefits to all customers that are equal to the average total net benefit of the selected proposals. Next, during the extended RFP period, the Company proposes to allow customers to work with developers with the goal of submitting new projects at or below price

targets that result in a total net benefit that is greater than or equal to the average total net benefit of the selected portfolio. (*Id.*) This Customer Identified Resource ("CIR") option allows interested customers to work with project developers to identify resources to fill outstanding subscription needs. (Tr. 217.) Proposals submitted as CIRs would undergo a full economic and interconnection analysis by the Company to ensure that the final pricing secures the resources in a manner that preserves benefits and remains protective of all customers.

The Company disagrees with CEBA's recommendation to bypass the Commission-approved RFP process and implement its CIR option on a rolling basis. As proposed, the CIR option would be included as part of a competitive RFP. This means that any proposed CIR would be fully evaluated by the Company consistent with the resources selected through the RFP and would only be selected if deemed beneficial to all customers. By matching the price targets for CIRs to the average total net benefit of the portfolio of resources procured in the RFP, the Company can ensure that any CIRs selected provide value to all customers and that no costs are being shifted to non-participants. This process also ensures that if there is a difference between the term length of the subscribing customer agreement and the term length of the supplying power purchase agreement ("PPA"), all customers would benefit from the fixed price energy even after the subscribing customer agreement ends. (Tr. 5063).

Notably, PIA Staff and Intervenors do not recommend that the Commission reject the Company's CIR option or other proposed RFP enhancements. To preserve customer protections established by the Commission through its RFP process and the corresponding rules, Georgia Power does not believe that the recommendations brought forth by CEBA should be adopted. Thus, Georgia Power requests the Commission approve the RFP enhancements as proposed in the 2025 IRP.

8. The Commission should approve the Company's proposed Customer-Sited Solar Plus Storage Pilot Program.

The Commission should approve the Company's proposed Customer-Sited Solar Plus Storage Pilot Program ("Solar Plus Storage Pilot"). Consistent with the 2023 IRP Update Order,[1] the Company designed and developed the Solar Plus Storage Pilot based on current best practices and feedback from stakeholders. The design appropriately considers the incentives required to drive participation and practical pilot limitations and provides an opportunity for the Company to learn and solicit feedback from two distinct participation pathways. (Tr. 5065–66.) The Company has addressed concerns raised by PIA Staff and Intervenors by removing the restriction on grid charging in the Company Directed pathway, endeavoring to avoid calling on resources in advance of widespread extreme weather events, committing to making the Customer Directed option available for 10 years, and working with its program implementer, once selected, to offer a publicly accessible dashboard of enrolled MW to provide information on pilot status. (Tr. 5065.)

Intervenors offered additional pilot modifications related to incentive levels, system size requirements, and rate structure. The Commission should not require that Georgia Power adopt these additional adjustments as the Company's proposed pilot structure, as modified, is a fair and reasonable design that will facilitate learnings on customer response and system benefits. Additional modifications and adjustments are inappropriate at the current stage. Regarding rate-related recommendations, the Company's proposal to prohibit participating customers taking service under energy-only rates aligns with customer interest in responding to TOU price signals and prevents a cost shift to non-participating customers. (Tr. 5066.) By maintaining a size limit for program eligibility, the Company discourages deployment of oversized systems and increases

[1] *Order Adopting Stipulated Agreement*, Attachment A, Docket No. 55378 (Apr. 26, 2024) at ¶ 17.

program efficiency by avoiding complex and burdensome case-by-case evaluations required for larger systems. (Tr. 5067–68.) Ultimately, while many had recommendations, all Intervenors who commented were supportive of the pilot offering. (Tr. 5069.)

The proposed Solar Plus Storage Pilot fulfills a Commission directive by offering residential and small commercial customers meaningful options to participate in and benefit from Georgia's energy transition, while enhancing grid reliability through dispatchable capacity additions. Approval of the program is consistent with Commission precedent favoring carefully designed pilot programs to allow thorough assessment of the impacts and benefits before broader implementation, mitigating risks and ensuring efficient use of customer funds. For these reasons, the Commission should approve the Solar Plus Storage Pilot as modified.

9. The Commission should approve the Company's proposed modifications to the CARES Subscription Program.

To ensure the continued success of the Clean and Renewable Energy Subscription ("CARES") Program, the Commission should approve Georgia Power's proposed program enhancements and modifications. In addition to the proposed CIR option discussed above, the Company proposes to expand the CARES Program to DG procurements and to update the hourly energy credit pricing methodology to limit the risk of increased costs to non-participating customers. (Tr. 224.) These proposed enhancements will offer customers additional avenues for subscribing to carbon-free resources while adding flexibility and optionality to the RFP process for bidders, subscribers, and non-participants alike.

Only CEBA and the GCLG oppose the Company's proposal to update the hourly energy pricing credit methodology, arguing that it would shift the risk entirely to participating customers, thereby discouraging participation. (Tr. 2327, 2897.) CEBA and the GCLG's recommendation,

however, ignores the reality of the program, which is that non-participating customers currently bear the risk that the hourly energy credits could exceed the subscription price paid by CARES participants over the term of the subscription. Notably, as Company Witness Mallard testified at the Rebuttal Hearing, the Company has not yet proposed the updated hourly energy pricing credit methodology. (Tr. 5092.) And when it does, as part of the updated CARES Program filing, Georgia Power has committed to engage with PIA Staff, stakeholders, and other interested parties to receive feedback and comments and review the methodology. (*Id.*) Accordingly, as proposed by the Company, the CARES Program design strikes the right balance between providing value to subscribers and protecting non-participating customers. The Commission should approve Georgia Power's proposed CARES Program modifications to enable continued, measured, and steady renewable growth and to reduce financial risks to non-participating customers.

The Commission should also reject CEBA's recommendation that the Company offer additional capacity resource subscriptions that provide a capacity credit to individual customers. This recommendation runs counter to the well-established regulatory compact and Commission-approved framework that the Company operates within. Georgia Power procures capacity for the benefit of *all* customers. It could be harmful to existing customers for the Company to procure capacity resources based on individual customer need and to offer capacity subscriptions for a capacity resource to a single customer. Georgia Power is committed to accurately reflecting the value that these and all resources bring to the system in customer subscription pricing, including capacity value, and offers subscriptions to the carbon-free attributes that renewable resources deliver. Georgia Power will continue evaluating the capacity benefits created by solar and solar and storage resources to ensure that costs and benefits are properly allocated to generators and subscribing customers.

B. The Transmission Plan Identified in the 2025 IRP Should be Approved as Proposed.

The Commission should approve the Transmission Plan identified in the 2025 IRP as proposed. The Transmission Plan included in the 2025 IRP identifies the improvements necessary to maintain a strong and reliable transmission system and is developed in accordance with Southern Company and Georgia Integrated Transmission System ("ITS") transmission planning guidelines as well as North American Electric Reliability Corporation ("NERC") planning standards. Importantly, the Ten-Year Plan presented in the 2025 IRP specifically: (1) incorporates load and growth changes for Georgia Power and Georgia Transmission Corporation ("GTC"), the Municipal Electric Authority of Georgia ("MEAG Power"), and Dalton Utilities (collectively, the "ITS Participants), including updates since the 2022 IRP and 2023 IRP Update; (2) updates on strategic transmission projects since the 2022 IRP to address South to North transmission constraints; and (3) includes additional considerations for evolving System needs beyond the traditional ten-year transmission planning window. (Tr. 120–21.) The Company accurately and comprehensively evaluated transmission issues through the robust planning framework in Georgia. Further, Georgia Power engaged, coordinated, and planned locally, regionally, and with neighboring systems to ensure reliable, cost-effective transmission expansion that maximizes benefits for customers. (Tr. 4719, 4760.)

The Commission should reject transmission planning-related reforms recommended by PIA Staff and Intervenors in this proceeding as Georgia Power already incorporates most of the suggested reforms that parties recommend. Further, the Company is prudently considering and developing the planning and process improvements recommended by PIA Staff and Intervenors as

part of evolving transmission planning processes and consistent with the requirements of FERC Order 1920.[2] (Tr. 4760.)

Parties recommend that Georgia Power adjust various aspects of the transmission planning process and adopt specified improvements including multi-value transmission planning methods, formal evaluation and consideration of GETs and non-wires alternative solutions, and overarching reforms related to local, regional, and long-term transmission planning issues. (Tr. 4760–68.) The recommended reforms seemingly ignore the fact that Georgia Power's current planning framework and process already incorporate many of the suggested adjustments. (Tr. 4760.) Georgia Power jointly plans and operates the networked transmission system with all ITS Participants, and this collaborative planning approach fosters natural checks and balances within transmission system planning and the development of future transmission project solutions. (Tr. 4761.) Consistent with PIA Staff and Intervenor recommendations, Georgia Power already (1) incorporates higher voltage and higher capacity solutions where effective and economical; (2) examines expanded ties to neighboring utilities and systems as part of the planning process; (3) works directly with interconnected utilities to perform joint evaluations; and (4) considers regional and transmission planning including the costs and benefits associated with potential solutions and consistent with the existing FERC regional planning requirements and processes. (Tr. 4765–66.) Further, FERC Order 1920 directly includes and requires most of the planning and process improvements that parties recommend. Georgia Power will include these planned enhancements in its FERC Order 1920 comprehensive compliance and execution plan currently under development. (Tr. 4763.)

[2] *Bldg. for the Future Through Elec. Reg'l Transmission Plan. & Cost Allocation*, 187 FERC ¶ 61,068 (2024) ("Order 1920").

Regarding the Company's investigation and deployment of GETs, as highlighted during the Rebuttal Hearing, Georgia Power has a strong track record of deploying economical, innovative solutions, including GETs, to meet the needs of its customers and the electric grid. (Tr. 4767.) For example, the Company has used advanced conductors for over a decade and continues working with industry leaders such as the Electric Power Research Institute ("EPRI") to test new advanced conductor products as they are proven safe and reliable. (Tr. 4768.) Georgia Power will continue exploring all options for meeting customer needs including innovative transmission solutions using GETs, where these technologies are safe, reliable, and economical.

Regarding the evaluation of battery storage as a potential transmission solution, the Company presented ample evidence demonstrating that battery storage as a transmission alternative is often impractical and uneconomic. Georgia Power Witness Robinson identified several reasons highlighting this point including that: (1) batteries require grid power for charging, which cause it to act like additional load and potentially exacerbate constraints that additional resources and transmission solutions are intended to resolve; (2) batteries cannot simultaneously count as both generation capacity and a transmission solution within the Southern Company System; (3) four-hour batteries are not practical solutions to the contingencies identified in the 2025 IRP; and (4) Georgia Power would need to evaluate a total net present value of the battery systems versus wire solutions to contemplate the total life-cycle cost of the two alternatives. (Tr. 4770, 4850–52). As such, PIA Staff and Intervenor proposed changes to the Transmission Plan and the Company's transmission planning process are not needed and the Commission should approve the Transmission Plan as filed.

C. The Commission Should Approve the Company's Proposed DSM Plan.

1. The Commission should approve the Company's Proposed Case and DSM Plan.

Georgia Power's Proposed Case was developed in accordance with the Commission-approved DSM Program Planning Approach, per Commission Orders, in collaboration with the DSM Working Group ("DSMWG") and consistent with the Commission's Order Adopting Stipulation in the Vogtle Prudency Proceeding in Docket No. 29849 ("Vogtle Prudence Order") with a savings target of at least 0.75% of annual retail sales. The Commission should approve the Company's DSM Action Plan, including: (1) approval for a certificate of public convenience and necessity for the residential Products Program; (2) decertification of the residential Refrigerator Recycling Plus and Specialty Lighting and commercial Behavioral programs; (3) waiver of Total Resource Cost ("TRC") requirement in Commission Rule 515-3-4-.04(4)(a)3 to continue the Home Energy Improvement, Energy Assistance for Savings and Efficiency ("EASE"), HopeWorks, and Custom programs; and (4) updated economics for all other previously certified programs. Accordingly, to achieve the savings target set forth in the Vogtle Prudency Order, the Commission should approve the Proposed Case.

2. Alternatively, the Company finds PIA Staff's Recommended Case to be reasonable.

The Company supports and seeks approval of the Proposed Case; however, if the Commission determines that an alternative DSM plan that better balances the savings target and overall economics is necessary, the Company views PIA Staff's Recommended Case as the most reasonable alternative. Considering the significant upward pressure on rates resulting from the Proposed Case, the Company developed the Capacity and Affordability Case sensitivity, which targets the DSM programs delivering the most capacity benefits and customers in the most need, and substantially mitigates the upward pressure on rates associated with the Proposed Case. PIA

Staff's Recommended Case accomplishes a similar goal through modifications to the Company's Capacity and Affordability Case sensitivity and provides a reasonable option for the Commission's consideration.

3. Georgia Power should not be required to continue the Supply-Side Case.

The Supply-Side Case was developed as a sensitivity case as outlined in the DSM Program Planning Approach and stipulated in the 2022 IRP Order. However, as explained in the Rebuttal Testimony of Company Witnesses Beppler, Goff, and Mallard, the Supply-Side Case is burdensome and unnecessary. (Tr. 5052, 5096–99.) It is not a prudent use of Company resources to perform additional intensive modeling that provides no measurable benefits for the Company, customers, or other participating parties since previous iterations have not produced a robust portfolio of implementable DSM programs for customers. Accordingly, the Commission should not require Georgia Power to continue developing the Supply-Side Case in future IRPs.

No party has supported nor recommended the Supply-Side Case before the Commission. Further, it does not produce superior results to Georgia Power's existing DSM program planning process. The Company determines its recommended portfolio of DSM programs and measures through the Commission-approved DSM program planning process. This includes: (1) utilizing standard utility cost-effectiveness screening tools; (2) incorporating input from a variety of stakeholders as well as the Company's third-party design consultant; (3) leveraging lessons learned through program delivery, program evaluation, and historical program performance; and (4) collaboration with PIA Staff and the DSMWG.

4. *DSM Budget*: The Proposed Case DSM budget is required in light of the increased savings target included in the Commission's Vogtle Prudence Order.

To achieve the 0.75% savings target set forth in the Vogtle Prudence Order, Georgia Power's Proposed Case includes a DSM program budget with incentive levels and components that result in an increased DSM budget from years past. While PIA Staff and other Intervenors criticize these increased budgets, Georgia Power and its program design consultant determined it was consistent with the Company's technical potential study and necessary to meet the 0.75% savings target. Therefore, should the Commission approve the Proposed Case, the Commission should approve the corresponding DSM budget that will provide the Company the necessary mechanisms and initiatives to meet the 0.75% savings target.

GIPL Witness Sherwood compares the Company's historic and projected energy savings as well as the costs to achieve savings to that of "peer" utilities in other states. (Tr.3582–84, 3613.) This comparison is not a valid method for establishing the appropriate DSM savings targets and costs to achieve, because it incorrectly assumes a "one size fits all" approach to DSM policies. (Tr. 3616–17.) In reality, each state makes its own unique determinations regarding policies that guide ratepayer-subsidized DSM implementation, and state-specific considerations will shape such policy development. These considerations include the energy-intensity of customers in each state; cost of electricity; capacity needs; regulatory structure; and other state level initiatives such as energy efficiency goals or mandates, renewable portfolio standards (where energy efficiency can aid in compliance), and state or regional greenhouse gas control initiatives. (*Id.*; Tr. 5054.) GIPL Witness Sherwood's comparison is also flawed because it assumes that Georgia Power can achieve future savings at the same cost as what it took to achieve past savings. This assumption is not consistent with the Company's technical potential study and does not take into consideration the impact of inflation and other factors.

5. *On-Bill Financing*: It is not prudent to offer on-bill financing due to the lack of success of the Residential Investment Saving Energy ("RISE") Pilot and the ultimate expense to customers.

The Commission should not require that Georgia Power implement an on-bill financing program given the lack of success of the RISE Pilot and the expense to non-participating customers. (Tr. 5055.) Several Intervenors recommend the Company offer on-bill financing for certain income qualified customers. (Tr. 2907–08, 3535–36.) Although not identical, the Company previously offered the RISE Pilot, which had similar features and targeted income qualified customers where there was a guarantee of monthly savings for the participating customer; notably, the pilot was deemed unsuccessful. In the RISE Pilot, Georgia Power covered the upfront cost of energy efficiency and DSM improvements, recovering those costs over time through a charge applied under a customer-specific RISE Tariff. Under the RISE framework, the savings a customer realized each month from energy efficiency improvements more than offset the additional charge on their bill from the RISE Tariff. However, the Company found that covering the upfront costs for customers who later paid a charge over time did not increase customer adoption of or participation in energy efficiency measures. The Company also found it difficult to find qualifying customers. Despite extending the RISE Pilot from 3 to 6 years, it enrolled only 18 participants. Although on-bill financing utilizes third-party financing, there is no evidence that a third-party financing arrangement would be more successful than the RISE Pilot's tariff-based approach, which offered customers the same benefit of participating without an upfront investment. Further, with on-bill financing, there is no guarantee that a customer will realize savings each month that eclipse the cost of their financing arrangement. Moreover, with any financing arrangement, a customer will pay more in the long term than the cost of the energy efficiency measure and may

continue to make these payments beyond the measure's useful lifetime. For all these reasons, the Commission should not require that Georgia Power implement on-bill financing.

6. *DSM Costs and Additional Sum*: The Commission should approve the costs for all approved and certified DSM programs, pilots, and other activities. The Commission should approve an additional sum of $0.04 for every kWh saved.

The Commission should approve the Company's reasonable request for an additional sum of $0.04 for every kilowatt hour ("kWh") saved, using the verified, net energy savings along with the amended additional sum calculation. The proposed $0.04 per kWh additional sum is in line with the average amount per kWh earned by the Company from 2012 through the previously approved annual DSM true-up process. By using an average amount, the proposed methodology accounts for years in which the Company is able to achieve cost efficiencies in implementing its DSM programs. As it stands currently, the Company receives little to no additional sum from residential DSM programs that result in energy savings. Under the proposed amended additional sum calculation, all energy savings will be valued the same. This methodology also provides more stability in the metric used to determine additional sum and certainty with respect to the incentive the Company will receive for implementing its approved DSM programs, as allowed by state law, while reducing resources needed by the Company and PIA Staff to review and verify the savings and data.

As explained by Witness Goff during the Company's Rebuttal Hearing and in response to data request STF-PIA-12-19, the proposed additional sum of $0.04 per kWh and updated methodology provides for the equitable sharing between Georgia Power and customers as measured by the TRC benefits. (Tr. 5106.) For all program years (2026 through 2028), 95% of the TRC benefits are provided to customers.

PIA Staff recommends that the Company receive an additional sum of $0.02 per kWh saved on net energy savings from income-qualified programs, while maintaining its current additional sum calculation for all other programs. However, PIA Staff provides no support for its arbitrary reduction to $0.02 per kWh saved on income-qualified programs. Further, no party disagrees that the Company should receive an additional sum. Accordingly, the Commission should approve the Company's request for an additional sum.

D. Georgia Power's Decision Not to Rebut Every PIA Staff and Intervenor Assertion or Allegation Does Not Mean that Georgia Power Concedes or Agrees with the Assertion or Allegation.

It would not be an effective use of PIA Staff, Intervenors, or this Commission's time for Georgia Power to rebut every single allegation asserted or implied in the 27 PIA Staff and Intervenor testimony filings made in this case. As expressly stated in the Company's Rebuttal Testimony:

> Due to the number of parties filing testimony in this case and the limited time available to file rebuttal, our testimony focuses on several key issues without attempting to address every issue or recommendation raised in Staff or Intervenor testimony. However, the fact that the Company may not respond to a particular position of Staff or an Intervenor should not be construed as acceptance of such position. (Tr. 4715.)

In the interest of expediency and efficiency in these proceedings, Georgia Power focused its rebuttal and its discussion in this brief on the core issues in dispute in this proceeding, rather than devoting unnecessary time and resources to refute positions that are clearly wrong or simply irrelevant to the issues presented in this docket. (Tr. 4715.) Moreover, even if Georgia Power had not expressly reserved this position, the Commission, PIA Staff, and Intervenors should not conclude that something was agreed to by the Company merely because it was not specifically addressed during rebuttal.

V. CONCLUSION

For the reasons set forth above, and based on the record in this proceeding, the Commission should approve Georgia Power Company's 2025 IRP and DSM Application, as modified by recommendations included in Georgia Power's Rebuttal Testimony.

Respectfully submitted, this 3rd day of July 2025.

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