



July 3, 2025

**VIA ELECTRONIC DELIVERY**

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

**RE: POST HEARING BRIEF IN DOCKET 56002**

Dear Ms. Tanner:

Please find enclosed an electronic version of the following Post Hearing Brief and Proposed Order to be filed in Docket 56002 on behalf of the Capital Good Fund.

Respectfully Submitted,

A handwritten signature in black ink that reads "Alicia Brown".

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Alicia Brown  
Director of Georgia BRIGHT  
Capital Good Fund  
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**STATE OF GEORGIA  
BEFORE THE  
PUBLIC SERVICE COMMISSION**

**In Re:**

**Georgia Power Company’s 2025  
Integrated Resource Plan**

**Docket No. 56002**

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**POST-HEARING BRIEF BY  
THE CAPITAL GOOD FUND, INC.**

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The Capital Good Fund, Inc. (“Good Fund”) respectfully submits this Post-Hearing Brief with its comments and recommendations in response to the evidence before the Georgia Public Service Commission (“Commission”) in Docket No. 56002: Georgia Power Company’s 2025 Integrated Resource Plan. Good Fund also urges the Commission to adopt the Good Fund’s proposed Ordering Paragraphs in the final order in these dockets, which is attached as “**Exhibit A.**”

**BACKGROUND**

On January 31, 2025, Georgia Power Company filed its 2025 Integrated Resource Plan, for which it seeks Commission approval. In this filing, as with any IRP filing, the Company proposed a portfolio of generation resources, transmission resources, and customer-sited programs that are intended to meet future energy needs as safely, reliably, and affordably as possible. Two areas of the filing were of particular interest to Good Fund, as a nonprofit solar developer and an awardee under the Environmental Protection Agency’s Solar for All program—the Customer-Sited Solar + Storage Pilot Program and Community Solar, which encompasses both an existing program and the newly proposed Residential Distributed Generation Community Solar Program.

The Commission heard direct testimony from the Company on March 25-27 of 2025; direct testimony from the Public Interest Advocacy Staff (“PIA Staff”) and other intervenors on May 27-30 of 2025; and rebuttal testimony from the Company on June 23-24 of 2025. This testimony establishes the record for these proceedings.

### **RECOMMENDATIONS**

Good Fund respectfully requests that the Commission incorporate the Proposed Order in Exhibit A into its final order in this case. This Proposed Order would, in summary:

1. Approve the proposed *Customer-Sited Solar + Storage Pilot Program* with modifications to the system size limits for residential and commercial systems, the categories of customers receiving enhanced compensation for their participation (currently income-qualified households, municipalities, universities, schools, and hospitals), and the compensation structure for the Company-Directed program.
2. Create a streamlined procurement pathway for income-qualified community solar projects participating in the federal Solar for All program

### **SUMMARY OF ARGUMENT**

#### **Customer-Sited Solar + Storage Pilot Program**

*The Proposed System Size Limits Do Not Meaningfully Streamline the Enrollment and Interconnection Process, and Do Little To Reduce the Need for Grid Upgrades*

As proposed, the Company’s Customer-Sited Solar + Storage Pilot Program sets system size limits of 20 kW and 250 kW, respectively, for residential and small commercial solar and battery systems. During cross examination, Dr. Beppler defined “capacity” as “the ability of those resources to export to the grid,” which was further clarified to be mean that a residential system

“should never be able to, regardless of the load at the site, export more than 20KW.”<sup>1</sup> This means that the system size limit would be the sum of the solar inverter capacity and battery inverter capacity in the case of an AC-coupled system, and the capacity of the shared inverter in a DC-coupled system.

The rationales provided for these proposed limits were numerous and varied; in response to STF-PIA 3-8, the Company expressed that the 20 kW residential limit was “set with a goal to mitigate costs associated with distribution and service upgrades thereby simplifying the implementation process and minimizing additional costs to customers.” In the same response, the Company added: “This limit will also encourage right-sizing the ratio of solar and storage consistent with the Company’s existing behind-the-meter solar programs.” Later, in rebuttal testimony, the reason given was that the 20 kW residential limit would “enable an efficient enrollment and interconnection process including assurances of the safe and reliable operation of existing equipment used to serve customers and minimizing additional cost to customers due to upgrades that might be required to support systems above 20 kW.”

These reasons, both taken together and considered individually, are insufficient to justify a blanket ban on the participation of larger resources in the pilot program. As Good Fund’s expert witness, Mr. Russ Bates, noted under cross examination by the Company, the 20 kW cap does not, in itself, ensure that grid infrastructure is not overloaded. If two houses on a cul-de-sac are served by a single 25 kVA transformer, and both households choose to participate in this program, their combined export could easily overload the transformer if there are no export controls in place, or if the Company isn’t intentionally staggering their dispatch to stay within the transformer’s limits.<sup>2</sup> Put differently, while the cap can potentially reduce the number of situations that will either require

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<sup>1</sup> Hearing #1 Transcript - Day 2, Pg 0937, lines 21-24

<sup>2</sup> Hearing #2 Transcript – Day 2, Pg 2791, lines 4-9

a distribution system upgrade, active management by the Company, or passive management through export limits and controls, the cap cannot eliminate those situations.

Another key rationale for the system size cap that has been offered by the Company is minimizing the costs of distribution system upgrades. While this is a laudable goal, it is important to remember that the Company's current interconnection policy makes clear that the costs for any grid upgrades triggered by the installation of a distributed energy resource ("DER") are the responsibility of the customer whose system prompted that upgrade. Asked for clarification under cross examination, Dr. Beppler confirmed that this cost-causality approach to grid upgrades would remain in place, even for systems under the proposed cap.<sup>3</sup> In other words, the role of the system size cap in reducing the need for upgrades is essentially a gamble that other, neighboring customers served by the same infrastructure won't follow the lead of those around them and install a system. If they were to do so, upgrades could very easily still come into play, and abiding by the cap would offer no relief to the customer who was unfortunate enough to trigger the upgrades.

Looking at the same situation from a different angle, unless a customer is the only customer served by the transformer or other distribution equipment that must be upgraded to accommodate a DER, the customer would actually be providing a net benefit to their neighbors and the overall rate base by covering a system improvement that would eventually be needed anyway and would otherwise be supported by all customers. Good Fund's position is that if a customer wants a larger system and is willing to pay for these upgrades, they should not be barred from participating in the program simply because their system's capacity is over a somewhat arbitrary cap.

As Witness Bates noted throughout his testimony, Georgia Power's existing interconnection process is a more than adequate check to ensure the reliability of the distribution

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<sup>3</sup> Rebuttal hearings, day 2, 3:38:09. <https://www.youtube.com/watch?v=X0zKbOCcFu4>

system. While it is true that the Company offers a streamlined interconnection process for smaller systems, this is only the case for *solar only* systems, which are not relevant to this program. Battery installations almost always require additional analysis, particularly when used for standby purposes, because the battery is assumed to be an additional load that could itself trigger upgrades.<sup>4</sup>

It should also be noted that the Georgia Power interconnection policy specifically contemplates that there may be system configurations, hardware, or software settings that would affect their analysis of a system's grid impact. The relevant portion reads, "If the Energy Management System/BESS/inverters have special functionalities (such as single-directional power flow on certain circuits, communication lines, etc.), these functions, and all other details concerning the battery system's operation must be clearly indicated on the single-line diagram."<sup>5</sup> This shows that the Company is not only capable of performing a more individualized assessment, but already does it as a matter of policy, as do many other utilities across the country. Bottom line, there are minimal efficiencies to be gained in terms of interconnection speed from having a cap, and any risks that are being insinuated are already assessed and addressed during the interconnection process.

Another reason provided by the Company for the system size cap is that the cap will help ensure that systems are right sized for the customer's energy use, as well as in terms of the ratio of solar capacity to battery capacity. This need for right sizing was described as important primarily for consumer protection reasons, which like the desire to avoid grid upgrades is a laudable goal. Unfortunately, size limits alone do very little to address some of the most pervasive consumer protection issues, including high dealer fees, obscene costs per watt, installing solar on

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<sup>4</sup> Behind the Meter Distribution Interconnection Summary, pg. 10. Retrieved from: [https://www.georgiapower.com/content/dam/georgia-power/pdfs/company-pdfs/BTM-Distribution-Interconnection-Summary-09\\_23.pdf](https://www.georgiapower.com/content/dam/georgia-power/pdfs/company-pdfs/BTM-Distribution-Interconnection-Summary-09_23.pdf)

<sup>5</sup> *Ibid.*

a roof that is too shaded to generate savings, misrepresentation of available incentives, and misleading or inaccurate financial modeling. If the Company would like to address consumer protection in this program, it can do so by limiting participation to a vetted and approved contractor network—system size limits are not necessary for that purpose.

*The System Size Cap Leads to Worse Outcomes for the System Overall*

Under the current Georgia Power interconnection policy, systems larger than the proposed cap are being installed regularly, and they are doing so with the financial incentive to serve as much of their energy needs as possible behind the meter. The Company has asserted in various proceedings that such self-consumption creates a cost-shift from participating to non-participating customers by leaving more of the fixed costs of the grid to be paid by non-participating customers. More than that, this focus on maximizing self-consumption means that customers are reducing their grid use when it makes the most sense according to static price signals in rates, rather than dynamic signals like would be available through the Solar + Storage Pilot program. For example, under the Overnight Advantage rate, customers are incentivized to reduce their grid usage between 2 and 7 pm on weekdays between June and September, so a customer might reasonably decide to discharge their battery at 4 pm, if instantaneous solar generation does not meet or exceed their total demand. However, it may be the case that the most urgent system peak is between 6:30 and 8 pm, by which point the customer may have depleted or nearly depleted their battery. This mismatch of available resources with demand imposes costs on all customers and is far more likely for solar and battery systems that are not enrolled in the pilot than those that are.

Another downside to the system cap is reduced investment in pockets of the grid that need it most. A key theme in the 2023 IRP update was that capacity was badly needed in metro Atlanta and north Georgia to meet growing demand that could not be met by moving energy from the more

sparsely populated southern parts of the state to load centers. Finding flat, affordable land for solar in these areas is difficult, but rooftops are abundant. By imposing the proposed system size cap, both residential and commercial properties will be disincentivized from turning otherwise unused real estate into clean, affordable, dispatchable generating facilities, right where capacity is needed most.

One final downside is reduced upgrade opportunities for legacy PV only systems. At this time, the battery attachment rate for behind the meter solar remains low, so there are thousands of legacy rooftop solar arrays that are exporting energy to the grid at more or less the same time and have no ability to shift energy use to times that are more ideal for the system. The Company maintains that these systems, whether on monthly netting or instantaneous netting or even energy offset only, represent a cost shift on energy-only rates and therefore impose costs on non-participating customers. Retrofitting these legacy systems with storage and dispatching these systems as a grid asset would ameliorate this shift and create benefits for the entire grid. However, because retrofitted solar is almost always AC-coupled, larger solar projects may have trouble staying under the cap and will therefore be disincentivized from making the switch. Whether the Company is right or wrong on the cost shift point, this is a missed opportunity to deliver value to all ratepayers.

#### *The System Cap Leads to Worse Outcomes for Participants*

In addition to worse outcomes for the system, there would of course be impacts to participating customers. The first would be that it would be harder to finance systems with the resilience characteristics that customers want. As solar and battery technology improves, customer expectations have evolved beyond simply keeping the lights and refrigerator running. There is now a desire to support loads for cooling, cooking, water heating and other use cases that are critical to

comfort and well-being during a disruption, and unfortunately these loads require larger solar arrays and larger battery inverters. The Company might maintain that this level of backup is a luxury that ought to be paid for by the customer, but the fact remains that these resources would be a net benefit to the system if directed by the utility and matched to system needs.

At a minimum, the Commission should redefine the system size caps for both residential and commercial systems to be defined as export ability to the grid in consideration of any software or hardware limits that may be in place. This would not only increase participation in the pilot program, but also minimize the cost of grid upgrades, which is a stated goal for the Company. Moreover, by allowing export controls, the Company would gain valuable learnings, which is another stated goal for this pilot.

*The Current Incentive Structure for the Company Directed Cohort Doesn't Adequately Compensate for Heavier Duty Grid Services*

As currently proposed, the only compensation that will be provided to participants in the Company Directed cohort of the Solar + Storage pilot program is an upfront incentive, which is based on the net present value of a ten-year capacity forecast, adjusted for line losses. In exchange for this one-time payment, the Company receives the right to dispatch batteries for any grid service, including high-impact uses such as frequency regulation, which can cause greater wear and degradation to the battery. The Company's rationale for an incentive that is only based on capacity, but use cases that include ancillary services, is the inclusion of an effective load carrying capacity ("ELCC") value of 100%, which is the ELCC that the Company ascribes to the batteries that it owns and controls.

It is a mistake to conflate a resource's ELCC with its abilities in terms of ancillary services, and it is definitely not appropriate to offer no additional compensation for daily or near-daily use

for these purposes. As an example, nuclear plants have a near 100% ELCC, but they are not a good fit for ancillary services that require rapid adjustments in output. Asking a nuclear plant to provide these services would impose additional costs that would need to be covered in some way, because operating a plant in this way would degrade certain equipment systems quicker than would be the case if the system were operated differently. The same is true for distributed batteries.

The Company rightly notes that Rocky Mountain Power uses the batteries in its WattSmart program for a variety of uses, including heavy duty grid services like frequency regulation. However, the Company misses the very important distinction that the Rocky Mountain Power program is for a four year term rather than a ten year term and offers ongoing annual incentives to participants. These distinctions matter and should be re-assessed in the Company's compliance filing.

The Commission can ensure that this issue is rectified in one of two ways—it can either direct the Company to propose a framework for ongoing compensation for non-capacity use cases based on the actual, verified value those services provide to the grid, or it can direct the Company to shorten the term but keep the compensation the same. In any case, this program will have a much higher likelihood of success if customers receive greater compensation as the Company receives greater benefit from their batteries.

*MUSH should include Nonprofits and Houses of Worship*

Good Fund's final proposed modification is for the MUSH category, which receives an increased upfront incentive under the company-directed pathway and an increased enrollment incentive under the customer-directed pathway, to be expanded to include other public-serving, tax-exempt organizations such as community-based organizations and houses of worship. As the Company notes in the Main IRP Document, MUSH customers provide significant benefits to their

communities—from education and healthcare to critical public services. The same is true for nonprofit organizations and houses of worship, many of which are actively seeking solar and storage to serve as resilience hubs so they can provide relief during and after natural disasters. Expanding the definition of MUSH to include other nonprofit community institutions is an important step toward empowering more organizations to serve their communities and the grid through on-site solar energy and storage.

### **Community Solar**

While on-site solar and storage is becoming more accessible every day, some households remain unable to access it due to shading, HOA restrictions, lack of ownership, and other factors. Community solar is critical for these families, many of whom are highly energy burdened, to access the money-saving benefits of solar energy. On Earth Day, 2024, Good Fund and 59 other organizations across the country received funding through the EPA Solar for All program, a \$7 billion program that is specifically focused on low-income and disadvantaged communities.

Good Fund’s work plan, which has already been approved by the EPA, earmarks \$25 million to work with Georgia utilities to deliver savings of 20% or more to eligible families through utility-led community solar. The key feature of this proposal is that it was written specifically for the regulatory structure here in Georgia and the priorities of this Commission—that is, the proposal is written to deploy cost-effective resources in the locations that benefit the system most, and the savings that are generated are from federal funding, tax incentives, and RECs, not from non-participating ratepayers.

In its direct testimony, Good Fund assessed both the existing community solar program and the company’s proposed Distributed Generation Community Solar program for consistency with the needs of the Solar for All program. To reiterate, neither program aligns ideally—

subsidizing subscriptions in the legacy program would not be additional, which Good Fund needs to achieve the outputs and outcomes in its approved workplan, and the new program would require Good Fund to go through the DG RFP, which would delay work on this program when time is of the essence, since the program concludes in April of 2029. While solutions could be identified to make the existing or proposed program work, should the Commission choose to go that direction, the preferred solution would be to create a new income-qualified community solar option in which the Company would establish a target price and other criteria, and Good Fund would develop and bring a PPA that is consistent with those requirements for streamlined interconnection by the Company. This resource would then be available for subscription under a model that allows savings of at least 20% per month on a net basis for five years. Approving this pathway would add cost-effective clean energy resources to the system and deliver meaningful bill relief to low-income households, without shifting costs to non-participating customers. This is the definition of a win-win, and is precisely the kind of collaboration the Commission should look to support.

#### **EXHIBIT A – PROPOSED ORDER**

**WHEREFORE, IT IS ORDERED**, the Company’s proposed Customer-Sited Solar + Storage Pilot program is adopted; provided, however, that the residential system size cap is raised to 25 kW. The commercial system size cap is adopted as proposed; provided, however, that the Company develops a waiver or appeals process for systems that would otherwise be excluded to be evaluated and approved on a case by case basis as part of the interconnection process.

**ORDERED FURTHER**, the definition for the system size cap for the Customer-Sited Solar + Storage pilot program is defined as export ability to the grid, in full consideration of any export-limiting configuration, hardware, inverter or EMS settings, or other controls; provided,

however, that the Company may require additional testing of these controls to ensure that they adequately protect the integrity of the distribution system.

**ORDERED FURTHER**, the additional compensation that was proposed for MUSH customers under the Customer-Sited Solar + Storage pilot program will be available to any tax-exempt customer, including nonprofit organizations and houses of worship.

**ORDERED FURTHER**, the Company shall develop a proposal for compensating participants in the Company Directed cohort of the Customer-Sited Solar + Storage pilot program for services provided beyond capacity. This may be accomplished by shortening the contract term but keeping the compensation at the proposed level or by providing ongoing compensation on an annual basis based on the actual value of provided grid services, or in some other way that is deemed appropriate by the Commission Staff. The Company's proposal shall be presented as part of the Company's compliance filing for the program and shall be brought before the Commission for approval.

**ORDERED FURTHER**, the Company's proposed Distributed Generation Community Solar Program is approved; provided, however, that within 60 days of the date of the Order adopting this Stipulation, the Company shall develop and open a streamlined procurement pathway for community solar projects in support of the federal Solar for All program. The Company shall create a simplified procurement framework under which it will enter into Power Purchase Agreements (PPAs) for community solar projects that meet defined criteria in terms of size, location, price, interconnection readiness, and system and subscriber benefit. The target PPA pricing provided by the Company may vary based on the project's location, the proposed duration of the subscriber savings requirement, and other factors that will affect the value the project provides to the system and impacts to non-participating ratepayers. Notwithstanding the following,

pricing should be negotiated in good faith to support compliance with federal requirements and reasonably allow for the financing of projects. This framework shall be open to proposals from any Solar for All Recipient, Subrecipient, or properly procured Contractor and shall not require participation in a competitive RFP or further Commission approval. This approach will maximize benefits to income-qualified customers, enable full utilization of available federal funding, and accelerate the deployment of additional cost-effective distributed energy resources.

Respectfully submitted this 3rd day of July, 2025

A handwritten signature in black ink that reads "Alicia Brown". The signature is written in a cursive, flowing style.

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Alicia Brown  
*On behalf of Capital Good Fund*