



Via Alternative Electronic Filing

July 3, 2025

Sallie Tanner
Executive Secretary
Georgia Public Service Commission
244 Washington Street, 1st Floor
Atlanta, GA 30334

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

Dear Executive Secretary Tanner:

Please find attached the Post-Hearing Brief of the Clean Energy Buyers Association (CEBA). A certificate of service is enclosed.

Please contact me with any questions about this filing. Thank you,

Sincerely,

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BEFORE THE PUBLIC SERVICE COMMISSION

STATE OF GEORGIA

In Re:	:	
	:	
GEORGIA POWER COMPANY'S	:	DOCKET NO. 56002
2023 INTEGRATED RESOURCE PLAN	:	
UPDATE	:	
	:	
AND	:	
	:	
GEORGIA POWER COMPANY'S 2025	:	DOCKET NO. 56003
APPLICATION FOR THE	:	
CERTIFICATION,	:	
DECERTIFICATION,	:	
AND AMENDED DEMAND-SIDE	:	
MANAGEMENT PLAN	:	

POST-HEARING BRIEF

OF THE

CLEAN ENERGY BUYERS ASSOCIATION

JULY 3, 2025

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I. Introduction and Summary of Recommendations.

The Clean Energy Buyers Association (CEBA) thanks the Commission for the opportunity to participate in this proceeding. CEBA also thanks Georgia Power Company (Georgia Power or the Company) for its collaboration with CEBA and its members to develop the Customer Identified Resources option. Georgia Power's Customer Identified Resources proposal is a good start, but changes are required to fully unlock the potential of this program. With CEBA's recommended improvements listed below, the Customer Identified Resources option will:

- Empower large customers to contribute their capital to help Georgia Power meet its urgent capacity and energy needs at lower cost,
- Lead to the near-term deployment of cost-effective clean resources that benefit all Georgia Power customers, and
- Encourage large customers with clean energy commitments to locate new loads and expand their existing loads in Georgia.

To achieve these goals, CEBA respectfully recommends that the Commission approve the Customer Identified Resources option with the following modifications:¹

- 1) Direct Georgia to procure Customer Identified Resources as a follow-on to the upcoming 2025 CARES Request for Proposals (RFP).

¹ CEBA notes that we have simplified and shortened our list of recommendations based on feedback from Staff, Georgia Power, and intervenors.

- 2) Direct Georgia Power to account for the avoided capacity value of clean firm Customer Identified Resources (e.g. renewables paired with storage) in the subscription price calculation, just as it does in the CARES CFE-ATC tariff.
- 3) Direct Georgia Power to allow multiple customers to coordinate to bring forward and subscribe to a single Customer Identified Resource.
- 4) Direct Georgia Power to allow existing customers to subscribe to up to 5,000 MW of Customer Identified Resources to support their existing loads and not to impose any cap on the amount of clean firm Customer Identified Resources procured to match new and incremental loads.

With respect to the CARES program as whole, CEBA further recommends that the Commission:

- 5) Affirm that the current Commission-approved CARES bill credit structure protects non-participating customers and so it is not necessary to establish “reimbursement thresholds” or otherwise cap hourly bill credits for the CARES program and the Customer Identified Resource option.

Further, CEBA urges the Commission to direct Georgia Power to improve its transmission planning processes by applying the principles that are working well within the Georgia Integrated Transmission System (ITS) on a region-wide and proactive basis. Specifically, CEBA recommends that the Commission:

- 6) Direct Georgia Power to conduct and submit a study on potential improvements to its joint transmission planning process with Alabama Power and Mississippi Power that includes the use of multiple future scenarios, consideration of multi-value benefit

streams, and the use of a cost allocation framework that ensures costs allocated to each operating company are roughly commensurate with the benefits to each.

- 7) Direct Georgia Power to proactively plan for various levels of utility-scale and customer-driven clean generation resource deployment in its transmission planning, and to include more information on renewable scenario analysis in future IRPs.
- 8) Direct Georgia Power to conduct and submit a study of the potential benefits of increasing the interregional transmission transfer capability between its balancing authority and adjacent regions.

II. Unlocking the potential of Customer Identified Resources.

Georgia Power faces an unprecedented challenge: meeting a projected capacity need of over 9,000 MW by the winter of 2030/2031.² At the same time, many of Georgia Power's existing and prospective large customers, including CEBA members, have ambitious clean energy commitments and "now consider, if not prioritize, their ability to access clean energy when determining where to locate new facilities and which existing facilities to expand."³ As the Commission navigates the challenges before it, the Customer Identified Resource option – as modified by CEBA's recommendations – offers a revenue-neutral solution to Georgia Power's capacity needs. In short, the Customer Identified Resource option will allow many of the customers driving load growth to contribute their capital toward meeting the load growth challenge. With

² Rebuttal Testimony of Jeffrey R. Grubb, J. Randy Hubbert, M. Brandon Looney, Michael B. Robinson, and Francisco Valle at 22:1 (Figure 3).

³ Direct Testimony of Priya Barua and R. Brent Alderfer at 10:11-15.

CEBA’s recommended improvements, the Customer Identified Resource option will attract economic growth from customers willing to deploy their own capital to support clean energy.

- 1) Direct Georgia to procure Customer Identified Resources as a follow-on to the upcoming 2025 CARES Request for Proposals (RFP).

Large customer demand for clean energy is high, and time is of the essence. Georgia Power has only fulfilled a fraction of the over 9,000 MW of customer interest in clean energy subscriptions through the CRSP and CARES programs.⁴ In the 2023 CARES RFP that recently concluded, Georgia Power selected just over one-third (1,068 MW) of the total amount (2,875 MW) of clean energy capacity it was seeking.⁵ Additionally, a recent report commissioned by CEBA found that, nationwide, large customers are expected to demand a total of 275 GW of carbon-free energy resources by 2035, including 36 GW in the Southeast.⁶

In this context, Georgia Power’s proposal not to begin the “Phase II” extended RFP process to procure Customer Identified Resources until 2027 or later, resulting in projects coming online years later, is far too late.⁷ Large customers are eager to contribute toward meeting Georgia Power’s near-term resource need through Customer Identified Resource subscriptions. Many large customers have near-term clean energy commitments and are making decisions now about where

⁴ *Id.* at 20:15-21:2.

⁵ Rebuttal hearing Day 2 at 1:57:40, [PSC Doc 56002 GA Power IRP & 56003 Certification, Decert, Amended Demand-Side Management Plan](#).

⁶ Direct Testimony of Priya Barua and R. Brent Alderfer at 21:3-6 (citing “U.S. Corporate Carbon Emissions-Free Energy Demand Outlook” (available at: <https://cebuyers.org/blog/new-report-corporate-demand-for-carbon-emissions-free-electricity-grows-to-275-gw-over-next-decade/#:~:text=Large%20companies%20are%20set%20to,in%20collaboration%20with%20Wood%20Mackenzie>)).

⁷ *Id.* at 22:8-10.

to locate or expand their loads; their ability to subscribe to Customer Identified Resources sooner rather than later will encourage them to do so in Georgia.

In testimony, CEBA recommended that the Commission direct Georgia Power to allow customers to bring forward and subscribe to Customer Identified Resources on a rolling basis without waiting for an RFP process.⁸ This approach has several advantages, including allowing projects to come online more quickly and taking advantage of project opportunities as they become available.⁹ This rolling procurement process would protect non-participating customers because subscribing customers will pay for the full cost of the Customer Identified Resources to which they subscribe.¹⁰ Accordingly, CEBA recommended that the Commission find that its competitive bidding rules were satisfied by the rolling procurement process or find that Customer Identified Resources are supply-side resources of “extraordinary advantage” and therefore qualify for an exemption from the competitive bidding rules.¹¹

While CEBA continues to support its recommendation for rolling procurement, CEBA’s primary recommendation with respect to timing is to direct Georgia Power to implement the Phase II process to procure Customer Identified Resources as a follow-on to the 2025 CARES RFP. When asked at hearing about the feasibility of this timing, Georgia Power Witness Mr. Mallard responded that “each RFP stands on its own so I think changes could be made.”¹² This

⁸ *Id.* at 22:1-23:14.

⁹ *Id.*

¹⁰ *Id.* at 23:15-24:19.

¹¹ *Id.* (citing Commission Rule 515-3-4-.04(3)(f)(3)).

¹² *Id.* at 26:6-11 (citing Hearing Transcript Vol. 2 at 0934:2-14).

recommendation appropriately balances CEBA members' urgent clean energy needs with Georgia Power's preference to procure Customer Identified Resources through a bidding process.

- 2) Direct Georgia Power to account for the avoided capacity value of clean firm Customer Identified Resources when it calculates the subscription price, just as it does in the CARES CFE-ATC tariff.

Recognizing that Georgia Power cannot serve their loads with variable renewable resources alone, many CEBA members are eager to subscribe to clean firm Customer Identified Resources, which CEBA defines as resources with dispatchable capacity value such as renewables paired with storage and advanced nuclear.¹³ Despite the rapid load growth it is facing, Georgia Power has not proposed to compensate subscribing customers for the capacity contribution that clean firm Customer Identified Resources make to the system. This omission would fail to encourage large customers to deploy their own capital to support the firm resources that Georgia Power so urgently needs. Simply put, large customers are willing to support higher-cost clean firm resources that Georgia Power needs if the avoided capacity value these resources provide is recognized through the program as a reduction to the subscription price. Since the subscribing customers would pay for the full cost of clean firm resources, it is only fair that the avoided capacity value that these resources bring to the system is adequately recognized.

CEBA understands that Georgia Power treats its All-Source RFP as the venue for acquiring capacity resources and considers its CARES RFPs as processes for acquiring energy resources. While CEBA does not seek to upend these existing processes, it is important to remember that the distinction between energy and capacity is not as sharp as Georgia Power portrays it. "Capacity

¹³ *Id.* at 33:3-7.

resources” are simply generators or storage devices that can be dispatched to provide energy when it is needed, such as during peak demand periods. By the same token, “energy resources” provide capacity value even when they are not dispatchable and this capacity value, measured by their Effective Load Carrying Capability (ELCC), appears in Georgia Power’s resource ledger, meaning it reduces the amount of new capacity Georgia Power needs to procure to serve its load.

Accordingly, it is entirely consistent with Georgia Power’s vertically integrated structure and the regulatory compact for Georgia Power to recognize the capacity value of dispatchable Customer Identified Resources through its subscription pricing. Georgia Power already recognizes the capacity value of dispatchable clean resources (specifically renewables paired with battery storage) in its CARES Carbon-Free Electricity Around-the-Clock (CFE-ATC) option. Specifically, the CARES CFE-ATC tariff (Schedule: CFE-ATC-1) states “In exchange for payment of the Portfolio Price, each participating customer will receive Hourly Credits and a monthly fixed Capacity Credit in an amount based on the customer’s subscription level and the corresponding pro-rata share of the output of the CARES CFE-ATC Portfolio.”¹⁴ This tariff defines the monthly capacity credit a subscribing customer receives as follows: “Customer’s pro-rata subscription share in \$/kW of the CARES CFE-ATC Portfolio avoided or deferred generation capacity.”¹⁵ The value of this capacity credit reduces the monthly subscription price that a subscribing customer pays to participate in the CARES CFE-ATC option.¹⁶ Again, this structure

¹⁴ Exhibit CEBA-1 at 1.

¹⁵ *Id.* at 2.

¹⁶ *Id.* at 1 (Specifically, the formula for calculating the subscription price, CARES CFE-ATC Mo., is reduced by the value of the Capacity Credit.)

is entirely consistent with the regulatory compact in Georgia and the fact that the CARES CFE-ATC option involves an “overbuild” of batteries has nothing to do with this straightforward legal conclusion.

CEBA simply recommends that the Commission direct Georgia Power to apply the same capacity credit structure that it uses for the CARES CFE-ATC subscription cost to the Customer Identified Resource option for clean firm resources. While not all firm Customer Identified Resources will have 24-hour availability, any dispatchable resource can contribute to meeting demand during peak hours, which is what drives Georgia Power’s capacity needs. CEBA also clarifies that we only recommend that Georgia Power apply a capacity credit to customer subscriptions for Customer Identified Resources that are dispatchable, such as storage-paired renewables. Crucially, the capacity credit should begin applying to customer subscriptions starting in 2027, which is the first year Georgia Power projects a capacity need.¹⁷

3) Direct Georgia Power to allow multiple customers to coordinate to bring forward and subscribe to a single Customer Identified Resource.

The CARES program currently offers customers the ability to subscribe to a portion of capacity from the entire CARES portfolio on a pro-rata basis – to the extent capacity is available. The Customer Identified Resources option offers large customers the opportunity to subscribe to specific resources of a size that they choose, which is a feature that many large customers with clean energy commitments strongly support.¹⁸

¹⁷ Direct Testimony of Priya Barua and R. Brent Alderfer at 33:8-13 (citing IRP Main Document at 61, Tables 8.1A and 8.1B). Note that Georgia Power’s revised load forecast presented in its rebuttal testimony similarly projects a capacity need starting in 2027. See Rebuttal Testimony of Jeffrey R. Grubb, J. Randy Hubbert, M. Brandon Looney, Michael B. Robinson, and Francisco Valle at 22, Figure 3.

¹⁸ Direct Testimony of Priya Barua and R. Brent Alderfer at 35:16-36:5.

However, there is no reason that a Customer Identified Resource should be limited to only one customer. While some large load customers will need their own dedicated Customer Identified Resource, or perhaps several resources, to match their loads, other C&I customers may have loads that are not large enough to justify pursuing a dedicated utility-scale resource on their own, but their demand could be pooled with a handful of other customers.¹⁹ Several CEBA members such as retail and hospitality customers, for example, are interested in being able to work together and pool their demand to procure utility-scale projects on a faster timeline than they have been able to purchase through Georgia Power's existing subscription programs. CEBA respectfully urges the Commission to provide the same flexibility and economies of scale benefits to C&I customers of all sizes by allowing multiple customers to collaborate and subscribe to a single Customer Identified Resource. Georgia Power Witness Mr. Mallard indicated at hearing that Georgia Power is open to offering this flexibility, stating: "I don't think the Company is opposed, conceptually, to that."²⁰ CEBA appreciates Georgia Power's lack of opposition to this programmatic change and requests that the Commission approve it.

- 4) Direct Georgia Power to allow existing customers to subscribe to up to 5,000 MW of Customer Identified Resources to support their existing loads and not to impose any cap on the amount of clean firm Customer Identified Resources procured to support new and incremental loads.

Many of the large customers and large prospective customers driving Georgia Power's projected load growth are CEBA members that have ambitious clean energy commitments and

¹⁹ *Id.* at 36:13-22.

²⁰ Hearing Transcript Vol. 2 at 0935:4-13.

that are willing to deploy their own capital to match their loads with clean energy.²¹ According to CEBA's analysis, there is at least 4,650 MW of unmet customer demand for clean energy subscriptions from *existing* subscription requests, which does not include additional demand from future and expanding large customers.²² And Georgia Power is now even further behind on procuring resources for CARES subscriptions after the 2023 CARES RFP procured well below its target. CEBA is confident that customer enthusiasm for a robust Customer Identified Resource program is high and that Georgia Power can expect substantial customer demand – if the Commission adopts CEBA's recommended improvements.²³ To meet that substantial demand, the Commission should direct Georgia Power to allow customers to subscribe up to 5,000 MW of Customer Identified Resources matched to existing loads.

A robust Customer Identified Resource program will encourage customers to locate or expand their loads in Georgia while adding clean energy resources at no cost to non-participating customers.²⁴ To ensure that prospective and expanding customers can access the clean energy subscriptions they need to meet their commitments, the Commission should direct Georgia Power to allow customers to match all incremental loads with clean firm Customer Identified Resources without any cap. Because Customer Identified Resources are revenue-neutral for non-participating customers, not placing any limits on clean firm Customer Identified Resources for incremental loads will benefit Georgia Power's system and all customers.

²¹ Direct Testimony of Priya Barua and R. Brent Alderfer at 46:11-19.

²² *Id.* at 46:19-47:7.

²³ *Id.* at 47:8-16.

²⁴ *Id.*

III. Affirming the existing, Commission-approved CARES bill credit structure.

Without providing a specific proposal or tariff language, Georgia Power stated that it plans to establish “reimbursement thresholds” for the hourly energy bill credits that it provides to subscribers through the CARES program, including the Customer Identified Resources option.²⁵ CEBA appreciates that Georgia Power clarified at the rebuttal hearing that it is not seeking Commission approval of this concept in this docket.²⁶ However, Georgia Power has provided sufficient information in this docket for the Commission to reject the concept and affirm that the existing CARES bill credit structure is just and reasonable.

- 5) Affirm that the current Commission-approved CARES bill credit structure protects non-participating customers and so it is not necessary to establish “reimbursement thresholds” or otherwise cap hourly energy credits for the CARES program and the Customer Identified Resource option.

Georgia Power characterizes the “reimbursement threshold” concept as being necessary to protect non-participating customers in the event the value of CARES bill credits exceed CARES subscription costs.²⁷ However, the possibility that bill credits could exceed subscription costs at certain times does not mean that non-participating customers would be harmed. CARES bill credits would only exceed CARES subscription costs if Georgia Power’s marginal costs spike and, as Georgia Power Witness Mr. Mallard acknowledged at hearing, marginal costs can spike for any number of reasons that have nothing to do with the CARES program.²⁸ In other words, when

²⁵ IRP Main Document at 97.

²⁶ June 24, 2025 Hearing Recording at 1:25:01-1:25:15 (available at: <https://www.youtube.com/watch?v=X0zKbOCcFu4>).

²⁷ *Id.* at 1:22:20-1:22:40.

²⁸ *Id.* at 2:32:26-2:33:40:

marginal costs spike, customers will pay more for energy. The fact that marginal costs have spiked for reasons unrelated to the CARES program does not mean that non-participating customers are subsidizing participating customers; it simply means that Georgia Power is paying CARES subscribers the prevailing cost of energy. Capping CARES bill credits would penalize participating customers without protecting non-participating customers.

Moreover, the ability to hedge against future spikes in energy costs is an additional reason many customers sign up for CARES. CARES subscribers commit upfront to pay the full cost of the resources to which they subscribe, which is not guaranteed to be a good investment. Many customers take the risk on investing in a CARES subscription with the expectation that if marginal energy costs spike, they are somewhat hedged against such volatility. Georgia Power's proposal would create asymmetric risks for subscribers in that the potential benefits of their subscriptions are capped without any limitation on their downside risk. As a result, Georgia Power's proposal would needlessly discourage participation in the CARES program, including the Customer Identified Resources option.

Finally, Georgia Power agreed at the rebuttal hearing that the Commission has never found that the existing CARES credit structure is not just or reasonable.²⁹ As the saying goes, "If it isn't broken, don't fix it." Georgia Power has presented no evidence that the current CARES bill credit structure is problematic or harms non-participating customers in any way. To avoid the need to relitigate this issue in the future, the Commission should affirm in this docket that the current CARES bill credit structure protects non-participating customers.

²⁹ *Id.* at 2:31:00-2:31:30:

IV. Improving transmission planning to benefit customers.

The Direct Testimony of CEBA's witness Ted Thomas described how transmission infrastructure and better transmission planning can play a key role in mitigating many of the risks that utilities face and that regulators like the Commission manage for the benefit of customers. Just as a pension fund manager seeks to manage risks and create value for investors, the Commission should seek to mitigate risks and create value for Georgia Power's customers through effective regulation and proactive transmission planning.

- 6) Direct Georgia Power to conduct and submit a study on potential improvements to its joint transmission planning process with Alabama Power and Mississippi Power that includes the use of multiple future scenarios, consideration of multi-value benefit streams, and using a cost allocation framework that ensures costs allocated to each jurisdiction are roughly commensurate with the benefits.

Mr. Thomas's testimony describes the benefits to customers of the Southern Company Pool, which is the arrangement between Georgia Power, Alabama Power, and Mississippi Power to share generation resources when it is cost effective to do so.³⁰ While the Southern Company operating companies clearly recognize the benefits of joint generation planning and dispatch, they do not appear to evaluate the benefits of joint transmission planning in the same manner. While the operating companies' FERC-jurisdictional tariffs may include provisions for allocating the costs of a transmission project that crosses multiple service territories, Georgia Power should study the benefits of developing a system of cost sharing that makes the cost of transmission projects roughly commensurate with the benefits achieved for each operating company, rather than based only on the location of the transmission facility.

³⁰ Direct Testimony of Ted Thomas at 15:14-17:9.

In addition, it is not clear that the Southern Company operating companies evaluate and account for the multiple benefit streams of transmission, including production cost savings, in their transmission planning process. CEBA recommends that the Commission direct Georgia to conduct and submit a study of the benefits of improvements to joint transmission planning across the Southern Company Balancing Authority.

- 7) Direct Georgia Power to incorporate various scenarios of utility-scale and customer-driven clean generation resource deployment into its transmission planning assumptions.

Despite being keenly aware of the interconnection injection capacity limitations that solar and other clean energy developers face in Georgia, Georgia Power's ITS transmission plan does not consider the ability to connect new clean resources as one of the benefits of new transmission projects.³¹ Georgia Power also acknowledges that it has studied the transmission needs associated with 6 GW, 8 GW, and 10 GW of solar development, but the ITS transmission plan likewise does not include information about these potential scenarios.³² Moving forward, Georgia Power should proactively plan for different levels of future clean energy development and include information about renewable scenario analysis in its transmission plan as part of the IRP.

- 8) Direct Georgia Power to conduct and submit a study of the potential benefits of increasing the interregional transmission transfer capability between its balancing authority and adjacent regions.

The North American Electric Reliability Corporation (NERC) recently completed its congressionally mandated report, the Interregional Transfer Capability Study, and recommended

³¹ *Id.* at 22:3-23:4.

³² *Id.* at 23:5-11.

that utilities study and maintain the transfer capability between adjacent regions.³³ To help mitigate risks in future extreme weather events, the Commission should direct Georgia Power to study the potential benefits of increasing interregional transfer capabilities with its neighbors in various weather scenarios and report the results to the Commission.

V. Conclusion.

CEBA again thanks the Commission for the opportunity to participate in this proceeding and for considering our recommendations.

Dated: July 3, 2025,

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³³ *Id.* at 24:4-7.

BEFORE THE PUBLIC SERVICE COMMISSION

STATE OF GEORGIA

In Re: :
: :
GEORGIA POWER COMPANY'S : **DOCKET NO. 56002**
2025 INTEGRATED RESOURCE PLAN : :
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GEORGIA POWER COMPANY'S 2025 : **DOCKET NO. 56003**
APPLICATION FOR THE : :
CERTIFICATION, DECERTIFICATION, : :
AND AMENDED DEMAND-SIDE : :
MANAGEMENT PLAN :

CERTIFICATE OF SERVICE

I hereby certify that I have served the following parties with the foregoing via electronic mail as follows:

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