STATE OF GEORGIA

BEFORE THE

GEORGIA PUBLIC SERVICE COMMISSION

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

POST-HEARING BRIEF OF GEORGIA SOLAR ENERGY ASSOCIATION ('GA SOLAR")

GA Solar respectfully submits its Post-Hearing Brief to the Georgia Public Service Commission ("Commission") and pursuant to the Commission's 2025 Procedural and Scheduling Order in the above referenced docket.

Introduction

The Company has demonstrated that Georgia is experiencing an extraordinary amount of economic growth and the need to address the significant energy needs associated with this economic growth to maintain system reliability for all customers. The rate of economic development and speed of which the corresponding load growth is needed underscore the need for the Company to mobilize a wide array of resources now to meet customer demand and maintain system reliability.

The Customer-Sited Solar Plus Storage Pilot is a proposal included in the Company's 2025 IRP in response to the Commission's Order Adopting Stipulated Agreement in the 2023 IRP docket. As proposed, the Pilot targets 50MW of enrolled residential and small commercial solar and storage which the Company can dispatch to meet system needs in exchange for participant compensation. The Company has proposed two participation pathways in the Pilot referred to as the "Customer Directed" and "Company Directed" pathways.

Under the Customer Directed pathway, Participants would be notified of utility- called events, of up to four hours, which Participants can choose to respond to by dispatching their battery in exchange for compensation. As proposed, the Company would provide an annual enrollment payment to Participants of $15/kW and an annual performance payment of $1.50/kWh. This pathway would be open to new or existing solar plus storage systems or standalone storage. Additional incentive amounts are available for MUSH Participants.

Under the Company Directed pathway, Participants would enter a 10- year contract with the Company which would allow the Company to directly monitor and control the battery over the term in exchange for a one-time, upfront payment of $750/kW. The MUSH incentive is $1,000/kW. This pathway would only be available for newly installed systems and would have to be paired with solar. Systems in either pathway could be customer or third-party owned.

The Company states it filed the Pilot pursuant to the 2023 IRP Update Order and it was designed to encourage additional customer- generator pairing of battery with behind-the-meter (“BTM”) solar, ensure Participants receive sufficient incentive to install systems and

participate in the program, enhance the economics of solar plus energy storage systems, encourage market growth and support customer goals for clean energy and resiliency.

With adoption of the following recommendations, GA Solar strongly supports the Customer-Sited Solar Plus Storage Pilot as part of this IRP because it will help provide grid reliability and capacity benefits. Through this Pilot program, the Company will have access to an additional clean, affordable, and modular capacity resource to meet growing energy demands and gather critical data to inform system planning in the 2028 Integrated Resource Plan. This Pilot program will also give the Company additional operational experience to better understand the full range of services that customer-owned batteries can provide.

Recommendations

While the Company's stated intentions appear to be aligned with that of GA Solar and its members, there are several issues with the proposed Pilot that if not addressed, may sideline investments from OEM's, developers, financiers and customers that otherwise may have pursued Pilot participation. If, as anticipated, the proposed Pilot is not able to generate significant interest from potential Participants, the system, market and economic benefits the Company envisioned for the Pilot to produce will be limited. Therefore, GA Solar offers the following recommendations for the Commission's consideration:

General Program Recommendations

1. INCREASE PILOT TARGET CAPACITY TO 100 MW AND ALLOW FOR DYNAMIC ALLOCATIONS.

In its rebuttal testimony, the Company maintains in the Pilot program proposed capacity of 50MW divided evenly between the Company-Directed Customer-Directed. The Company argues that the capacity limit of 50MW is only a target capacity amount and that if the capacity amount is met before the next IRP cycle in 2028, it will consider increasing the capacity.

GA Solar recommends increasing the Pilot capacity target to 100MW because a 100MW amount will provide more market certainty that the Pilot program will remain available through the next IRP cycle in 2028. This market certainty will give small commercial customers the confidence to spend the time and resources needed to conduct proper due diligence without risking capacity limits will be filled before deciding to move forward. With a small commercial individual system size limitation of 250kW, and strong interest demonstrated by the Capital Good Fund Solar for All program, there is a foreseeable situation in which available capacity within either pathway could fill up faster than anticipated thereby creating the market uncertainty GA Solar's recommendation seeks to avoid. Moreover, because the program is designed to reserve 25% of the program benefits to nonparticipants, there is little to no risk to the Company and nonparticipants that having a higher capacity limit will cause unforeseen harm. Because there is potential for strong small commercial participation and little risk to nonparticipants, GA Solar recommends the Commission increase the program capacity to 100MW.

In addition, there is no reason for a rigid split of program capacity to be divided evenly between the two pathways available. This rigid split ignores how customer demand behaves. If Georgia households and businesses show greater interest in the Customer-Directed pathway, which early market signals suggest they will, then leftover MW under Company-Directed rules serve

no one. Dynamic allocation fixes this at no added cost, ensuring every available MW delivers value, lessons, and grid services instead of sitting idle. Other leading utilities with similar programs do this well. The lessons learned from real participation will shape future programs far more than lessons from a capped Pilot that artificially limits itself. If this is truly a Pilot, it must be allowed to test real demand.

2. COMPULSORY PROCEDURAL MECHANISM TO REASSESS PILOT CAPACITY.

Currently, if program capacity limits are met before the next IRP cycle in 2028, it is up to the Company's sole discretion as to if and when program capacity should be increased. The Company's rebuttal offers no practical reason why the Commission should tie its own hands. Technological innovations, federal and state incentives, and customer demand will change in the next ten years, possibly dramatically. A simple procedural step that will automatically allow the Commission to revisit Pilot performance, capacity utilization, and lessons learned gives this body the ability to adapt if participation exceeds expectations or if new grid needs emerge. This is smart oversight, not red tape. It ensures this Pilot remains a living tool, not a locked box that risks becoming obsolete before its lessons can shape statewide programs.

3. RAISE RESIDENTIAL SYSTEM SIZE LIMITS TO 25KW.

A chief justification for the 20 kW cap centers on existing customer system sizes. But in GA Solar's cross examination of the Company's rebuttal testimony witnesses, the Company agreed that residential load amounts are increasing and that installed solar plus battery system sizes are also increasing. Modern households more and more need larger systems to cover their actual usage and adoption of new electrical technologies, i.e., EVs, electrified heating and

cooling, home offices, and new appliances. As demonstrated in GA Solar's direct testimony, other utility solar and battery Pilot programs allow larger residential systems when supported by proper interconnection review and smart inverter controls. This is not hypothetical, it is industry standard practice. Keeping the system cap at 20 kW risks pushing families to undersize systems, missing cost savings and leaving homes less resilient during outages. A right-sized system paired with flexible storage makes homes more resilient and better equipped to support grid stability when it matters most.

Rather than looking at the past previously installed system sizes to determine system size limitations, GA Solar recommends that the Company instead look to the future and follow data that shows residential load demand is increasing year over year and that system size limitations, if any, should stay ahead of increasing load demand trends rather than constantly being behind. After all, isn't that what an IRP proceeding is all about – forecasting future load growth and making sure there's enough capacity to serve customers with reliable and affordable energy? The same should be true of this Pilot program. The Company should base system size limitation on future projected demand growth rather than obsolete previously installed system sizes that have no bearing on the future.

Another reason why GA Solar supports a 25kW system size limit instead of 20kW is because battery continuous discharge rates are also increasing. A Tesla Powerwall 2, for example, has a continuous discharge rating of 5kW. The newer Tesla Powerwall 3, however, has a continuous discharge rating of 11.5kW. With a system size limit of 20kW, a customer would be limited to just one battery instead of two. Said system size limitations unnecessarily restrict system sizes and potentially greater program participation. A residential system size limit of 25kW will better

accommodate the growing energy needs of modern households and allow for greater program flexibility.

4. PUBLICLY ACCESSIBLE DASHBOARD.

GA Solar applauds the Company for their agreement in its rebuttal testimony to implement a publicly accessible dashboard showing enrolled capacity for the Pilot. To clarify GA Solar's recommendation, this dashboard must do more than display enrolled capacity alone. It should track total Pilot capacity, remaining available capacity, the number of applications received, the number in queue, average approval times, and basic project milestones, updated at least monthly. That is the level of transparency customers, installers, and the Commission deserve. It empowers Participants to make informed, data-driven decisions and ensures this Pilot remains clear and credible in the public eye.

5. ESTABLISH CONSUMER PROTECTIONS

The Company's rebuttal sidesteps the need for consumer protections by pointing to existing contracts and internal processes. But families and businesses investing tens of thousands of dollars in solar plus storage deserve clear, consistent disclosures about how these systems work, what responsibilities they carry, and how any unexpected risks are handled. Reputable contractors already provide this, but requiring clear, standardized disclosures about the Company's Pilot program will level the playing field and shield customers from deceptive practices that undermine trust in the entire market. Intervenors have yet to be provided with a copy of an example contract for the company/customer directed pathways to review to ensure maximum consumer protection. Transparent and publicly available consumer protection

disclosures will ensure Participants clearly understand the risks, responsibilities, and benefits of participation.

6. ESTABLISH A STAKEHOLDER IMPLENTATION WORKING GROUP

With the Pilot program currently in the design phase and with much implementation ahead, the Commission should require the Company to form a Working Group with industry stakeholder participation during the implementation of the Pilot program, customer agreements, and other Program documents. The Company has left critical Pilot details to the Company Directed contract and other program documents to be developed and finalized in Q1 2026 with their implementation partner. Given these details will be paramount to the success of the Pilot and neither have been developed or disclosed, a stakeholder implementation working group should be established to facilitate stakeholder engagement between the Company and the OEM's, developers, financiers and potential Participants interested in ensuring this Pilot is able to realize the system, market and economic benefits the Company envisions. Industry stakeholders can provide an important perspective so that all aspects of the program are addressed on the front end, thereby maximizing program confidence and customer participation.

Company Directed Recommendations

1. SET A MAXIMUM NUMBER OF ANNUAL EVENTS OR HOURS.

In GA Solar's cross examination of the Company's rebuttal witnesses, the Company maintains that for the Company Directed pathway that (a) the incentive structure is fair and reasonable, (b) customers are required to enter into a 10-year term, (c) the typical warranty period for a

battery system is 10-12 years, (d) the upfront incentive for the Company Directed Pathway equals about one third of the cost of a battery system, and (e) the company will control of the battery eighty (80%) percent of the time during the term of the 10-year agreement. The Company has also maintained not to set any limitations on the total number of control events or hours that Participants' battery can be called upon. In fact, the Company states this pathway will not be event driven, but rather continual control of these systems throughout the contract term. Uncapped utility control of customer-sited and customer-funded battery over a 10-year term is inconsistent with most residential and small commercial energy storage Pilots and programs currently operating or being developed in the U.S. While there are a small minority of programs that require uncapped utility control of customer-sited systems, GA Solar is not aware of any programs that currently require uncapped control over a 10-year contract term. Without an event cap or a significantly reduced contract term, Company Directed Participants are put in a net negative financial position: paying for a battery system they have almost no control over and will be almost exclusively used to maximize system benefits over a significant portion of its useful life. GA Solar maintains that the Customer Directed pathway, as currently designed, is neither fair or reasonable from the customer's perspective.

Establishing a maximum number of events or hours per year that the Company could control the battery is fair and reasonable because it allows the Company to access dispatchable capacity during the hours that maximize grid benefits most throughout the year, while still allowing the participant to operate the device they paid for during non- event hours. Duke Energy, Green Mountain Power, Arizona Public Service, National Grid and Xcel Energy, all have Pilots or programs with a cap on the number of call events or hours. The only utility the

Company with an uncapped battery program is Rocky Mountain Power (“RMP”). RMP’s Wattsmart program allows for complete utility control similar to the proposed Company Directed pathway proposed by the Company, however, RMP’s Wattsmart program only requires a 4-year contract and offers an ongoing performance incentive for Participants. This leaves Participants with 5-7 years or more, of expected useful life for the battery to be used at the discretion of the participant.

A participant spending their own private capital to deploy a battery system will prefer to have, at least, occasional control during the device’s useful life. Providing a maximum number of annual events or hours will encourage a higher level of program participation and allow Participants greater control over and beneficial use of the battery system.

2. PERMIT ENERGY- ONLY RATES INCLUDING, RATE “R” AND “GS”.

The Company states that Participants should be restricted from rate "R" and "GS" because "these energy-only rates do not provide an appropriate time-of-use (“TOU”) or demand signal to incentivize operation of the solar and battery resources to maximize System benefit.” However, the Company also confirmed that Company Directed Participants cannot respond to TOU or demand price signals because the Company, not the participant, would be in direct control of the battery.

Restricting Company Directed Participants from energy- only rates is unfair because these Participants would not have the ability to dispatch the battery to mitigate peak rates or demand charges. These Participants will be relying on continuous control decisions of the Company which may not always be in the best economic interest of a customer on a TOU or

demand- based rate. The Company stated in its rebuttal testimony that the Company's operation of the battery will likely be coincident with the optimal economic dispatch of the battery for the participant. But if the Company ever dispatches the battery to meet system needs not exactly coincident with peak hours, or there is not enough stored capacity to meet their demand, Participants will be subject to higher peak rates instead of lower, energy-only rates.

Should the Company limit control to a maximum number of events, not allowing participation in energy-only rates may be appropriate as these Participants would then be able to directly respond to price signals during non- event hours. However, that is currently not the case. Therefore, GA Solar recommends the Commission adopt one or both of GA Solar's Company Directed recommendations, i.e., limit company control to a maximum of events, or allow Participants to take service under an energy-only rate plan.

Customer Directed Recommendations

1. ALLOW INCENTIVES FOR A FIXED TERM.

GA Solar applauds the Companies recommendation in its Rebuttal Testimony that a 10-year optional term be provided. In GA Solar's cross examination of the Company's rebuttal witnesses, the Company agreed that a 10-year term for the Customer Directed pathway will not impact the incentive structure nor the optionality provided in this pathway. The Company further agreed that the incentives can be adjusted within the 10-year term to reflect current avoided capacity cost. If the Company has not changed its position, GA Solar is in full agreement with this recommendation. GA Solar believes that by providing a fixed term under which

Participants can rely on the upfront and ongoing performance incentive with equitable adjustments reflecting the benefits to non-Participants will ensure high industry confidence in the program and encourage wide-spread customer adoption.

2. COMMUNICATE TO PARTICIPANTS A TARGET MAXIMUM OF EVENTS.

While the Company has proposed a minimum number of hours called in each annual period of 50 hours, the Company has not proposed a maximum number of hours called hours during an annual period in order to maximize potential value to the Participants. If the Company were able to provide a target or guideline as to the maximum number of hours called during an annual period, it would be helpful for Participants to make informed choices. With the publishing of an estimated maximum number of annual events, prospective Participants can have a right-sized view of incentive up-side potential. Indeed, such a published target could also serve as a deterrent to unscrupulous marketers over-promising Participants performance incentive amount. GA Solar recommends the Company adopt a target maximum number of events, in order to right-size expectations regarding incentive and frequency of customer-system interaction, as well as to deter unscrupulous marketers from misrepresenting the opportunity.

Conclusion

In conclusion, these recommendations all work together. They reflect how real families, businesses, and contractors engage with solar plus batteries today. They do not shift unreasonable risk to the grid or other ratepayers. They simply ensure the Pilot does what it claims: test real-world scenarios that can be scaled responsibly. Other states have

demonstrated these best practices. They are not radical asks; they are proven ways to unlock meaningful learning and responsible growth. Georgia Power has a role to play in maintaining reliability and protecting its system. But the public, the ratepayers who pay the bills, also deserve meaningful access, clear information, and choices that match the way they live in 2025 and beyond. GA Solar urges the Commission to adopt these recommendations in full and ensure that Georgia remains on the path toward a resilient, customer-driven clean energy future.

1. INCREASE PILOT TARGET CAPACITY TO 100 MW AND ALLOW FOR DYNAMIC ALLOCATIONS.
2. COMPULSORY PROCEDURAL MECHANISM TO REASSESS PILOT CAPACITY.
3. RAISE RESIDENTIAL SYSTEM SIZE LIMITS TO 25KW.
4. PUBLICLY ACCESSIBLE DASHBOARD.
5. ESTABLISH CONSUMER PROTECTIONS.
6. ESTABLISH A STAKEHOLDER IMPLENTATION WORKING GROUP.
7. SET A MAXIMUM NUMBER OF ANNUAL EVENTS OR HOURS IN COMPANY DIRECTED PATHWAY.
8. PERMIT ENERGY- ONLY RATES INCLUDING, RATE “R” AND “GS” IN COMPANY DIRECTED PATHWAY.
9. ALLOW INCENTIVES FOR A FIXED TERM IN CUSTOMER DIRECTED PATHWAY.
10. COMMUNICATE TO PARTICIPANTS A TARGET MAXIMUM OF EVENTS IN CUSTOMER DIRECTED PATHWAY.

Thank you for your attention, your time, and your commitment to doing what's right for Georgia families and businesses.

[END OF FINAL BRIEF]