

July 10, 2025

VIA ELECTRONIC DELIVERY

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

**Re: Motion to Enforce Vogtle Settlement on Behalf of Georgia Interfaith Power & Light
and Southface Energy Institute; Docket Nos. 56002, 56003**

Dear Ms. Tanner:

Please find enclosed an electronic version of the following **Motion to Enforce the Vogtle
Settlement on Behalf of Georgia Interfaith Power & Light and Southface Energy Institute**
to be filed in Docket Nos. 56002 and 56003.

Respectfully submitted,



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STATE OF GEORGIA
BEFORE THE
GEORGIA PUBLIC SERVICE COMMISSION

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

July 10, 2025

MOTION TO ENFORCE VOGTLE SETTLEMENT

Georgia Interfaith Power & Light (GIPL) and Southface Energy Institute move the Commission to reject Georgia Power's violation of the Commission's Vogtle Prudency Order, which incorporates the settlement entered into by Georgia Power and GIPL, Partnership for Southern Equity, Georgia Watch, and others.

The Vogtle Stipulation says: "Georgia Power agrees **to propose and support** in the 2025 [IRP and DSM dockets] ... a base case of DSM performance savings targets of at least .75% of annual retail sales."¹ The stipulation filed yesterday supports the wholesale rejection of that target, recommending instead a status-quo energy savings target of 0.51% of annual retail sales.² By

¹ Order Adopting Stipulation at ¶ 15, Dkt. 29849, Georgia Power Company's Application to Adjust Rates to Include Reasonable and Prudent Plant Vogtle Units 3 and 4 Costs (emphasis added).

² Stipulation Between Public Interest Advocacy Staff and Georgia Power Company, Dockets 56002 and 56003, at Demand Side Plan ¶ 8 (July 9, 2025).

signing a stipulation counseling *against* the Vogtle DSM terms, Georgia Power has abandoned its “support” of its proposed case, in egregious violation of the Vogtle Stipulation.

A docket stipulation is a recommendation to the Commission. The stipulation proposed here in the 2025 IRP and DSM dockets could have remained silent about DSM. Instead, it recommends “Staff’s Recommended Case” which, as shown in the following table,³ negates the intent of the Vogtle Stipulation to significantly increase demand side savings. Georgia Power’s signature on the stipulation here directly contradicts the terms of the Vogtle Stipulation and abandons its support for those terms and brazenly violates this Commission’s order.

Year	Total Retail Sales (MWh)	Energy Savings (MWh)	DSM Energy Savings Percentage of Total Retail Sales
2019	84,700,194	391,092	0.46%
2020	80,814,387	240,513	0.30%
2021	82,944,041	303,724	0.37%
2022	85,956,486	428,659	0.50%
2023	84,130,035	278,502	0.33%
2024	87,225,926	425,662	0.49%
2025	91,410,000	500,077	0.55%
2026 Staff’s Recommended Case	98,374,000	503,133	0.51%
2026 GPC’s Proposed Case	98,374,000	741,097	0.75%

³ Georgia Power’s Response to Staff Data Request PIA-2-8 (historical data, 2019-2024); Georgia Power’s Load and Energy Forecast, Attachment 2.0-1: Budget 2025 Forecast Annual Summary (projected sales 2025-2026); Staff Exhibits BCS-7 and BCS-9 (energy savings targets 2025-2026).

Accordingly, GIPL and Southface move the Commission to take all appropriate action necessary to enforce compliance with the Vogtle settlement. Specifically, we ask the Commission modify the Stipulation to strike paragraphs 5, 8 and 9, thereby adopting the savings target in Georgia Power's Proposed DSM Case.

Respectfully submitted this 10th day of July, 2025.



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CERTIFICATE OF SERVICE

I certify that the foregoing **Motion to Enforce the Vogtle Settlement** was filed with the Public Service Commission on behalf of Georgia Interfaith Power & Light and Southface Energy Institute in Docket Nos. 56002 and 56003 by electronic delivery on the 10th of July, 2025. An electronic copy of same was served upon all parties listed below by electronic mail as follows:



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