



Via Alternative Electronic Filing

July 10, 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 Clarification and Proposed Commissioner Motions 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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process to insert each of the paragraphs provided below into the Commission's Final Order. For convenience, CEBA has organized and separated our proposed Motion language to correspond with our numbered recommendations in CEBA's Post-Hearing Brief.

Prior to providing our proposed Motion language, CEBA takes this opportunity to clarify an important issue that was discussed during the July 10, 2025, Energy Committee meeting with respect to recognizing the capacity value of clean firm Customer Identified Resources.

CLARIFICATION:

CUSTOMER IDENTIFIED RESOURCES ARE SYSTEM RESOURCES

CEBA greatly appreciates the Commissioners' interest and questions during the Energy Committee meeting. During the discussion, it became clear that there may be a lingering misunderstanding about Customer Identified Resources, which will be system resources.

Georgia Power procures all resources for the benefit of all customers, including Customer Identified Resources. Georgia Power will only select clean firm Customer Identified Resources (*i.e.*, renewables paired with battery storage) that benefit all customers. Georgia Power will dispatch storage-paired Customer Identified Resources for the benefit of *all* customers – not for the sole benefit of the subscribing customers. These same principles apply to the existing CARES Carbon Free Energy Around the Clock (CFE-ATC) option, in which Georgia Power accounts for the avoided capacity value that subscribed storage-paired renewable resources provide when calculating the subscription price.

To summarize:

- Subscribing customers will pay the full cost of Customer Identified Resources through their subscription, on top of their normal electric rate.
- All Georgia Power customers will receive the full energy and capacity benefits of Customer Identified Resources under CEBA's proposal.
- The CARES Program provides credits that reflect the hourly energy value of the resources to which customers subscribe. The CARES CFE-ATC option additionally reflects the avoided capacity value of storage-paired renewable resources in the calculation of the subscription price.
- CEBA simply asks that the avoided capacity value of clean firm Customer Identified Resources be reflected in the calculation of the subscription price, using the same formula as the CARES CFE-ATC option.

To put it simply: **Subscribing customers will pay the full cost of Customer Identified Resources but these resources will be selected and operated for the benefit of *all* Georgia Power customers.**

PROPOSED COMMISSIONER MOTIONS

CEBA Recommendation 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.

To implement CEBA's Recommendation 2, CEBA requests that the Commission by Motion insert the following paragraph in the Final Order:

“The Commission finds and concludes that it is reasonable for the Company to account for capacity value in the CIR option for clean firm resources, such as renewables paired with battery energy storage. Clean firm resources provide more value to the Company's system and its customers than variable renewable resources alone, especially during this period of rapid load growth. CIRs are off-site, utility-scale, system resources that serve all customers, and will be fully paid for by subscribing customers. CEBA witnesses testified that large customers are willing to pay higher subscription prices for clean firm resources through the CIR option if the higher value these resources provide is recognized through the subscription price. The Company argued that accounting for the capacity value of a subscription resource was contrary to the regulatory compact. However, this position is refuted by the fact that the Company recognizes the capacity value of storage-paired renewable resources that participate in the CARES CFE-ATC option when it calculates the subscription price for the CFE-ATC option. The Company is therefore directed to use the same formula to account for capacity value that it uses for the CARES CFE-ATC option in the CIR option for clean firm resources starting in 2027, which is the first year the Company forecasts a capacity need. The Company shall ensure that accounting for the incremental capacity value of clean firm CIRs shall not harm non-participating customers.”

CEBA Recommendation 4: Direct Georgia Power to allow customers to subscribe to up to 5,000 MW of CIRs.¹

To implement CEBA's Recommendation 4, CEBA requests that the Commission by Motion insert the following paragraph in the Final Order:

“The Commission finds and concludes that the overall size of the CIR option should be increased to meet customer demand. Customer demand for clean energy subscriptions currently exceeds the available supply. Demand for clean energy subscriptions from future new and expanding customers is also expected to be high. The CIR option is driven by customer demand and resources will only be selected as part of a second phase of utility scale renewable RFPs if they provide benefits to all customers, so there is no risk that the Company will procure more CIRs than it needs. To meet both current and expected customer demand, the Company is directed to allow customers to subscribe to up to 5,000 MW of CIRs.”

Dated: July 10, 2025,

Respectfully submitted,

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¹ CEBA notes that we have simplified our Recommendation 4 for purposes of our Proposed Commissioner Motions.

BEFORE THE PUBLIC SERVICE COMMISSION

STATE OF GEORGIA

In Re: :
: **DOCKET NO. 56002**
GEORGIA POWER COMPANY'S :
2025 INTEGRATED RESOURCE PLAN :
: **DOCKET NO. 56003**
AND :
: **DOCKET NO. 56003**
GEORGIA POWER COMPANY'S 2025 :
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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