BEFORE THE
GEORGIA PUBLIC SERVICE COMMISSION

In Re:	)	
Georgia Power Company's	)	Docket No. 56298
Application For the Certification Of	)	Docket No. 56310
Capacity From the 2029-2031 All-Source RFP	)	
And Application For the Certification Of	)	
Capacity Supplemental Resources	)	

APPLICATION OF THE SIERRA CLUB AND THE SOUTHERN ALLIANCE FOR CLEAN ENERGY FOR LEAVE TO INTERVENE

COME NOW, the Sierra Club and the Southern Alliance for Clean Energy ("SACE") pursuant to O.C.G.A. §§ 50-13-14 and 46-2-59 and Commission Rule 515-2-1-.06, and hereby file this Application for Leave to Intervene ("Application") before the Georgia Public Service Commission (the "Commission") in the above-referenced dockets. In support hereof, Sierra Club and SACE respectfully show as follows:

Sierra Club is the nation's oldest and largest grassroots environmental organization, with over 600,000 members across the country, including nearly 9,000 in Georgia. Sierra Club's mission is to explore, enjoy, and protect the wild places of the Earth; to practice and promote the responsible use of the Earth's resources and ecosystems; to educate and enlist humanity to protect and restore the quality of the natural and human environment; and to use all lawful means to carry out these objectives. As part of this mission, Sierra Club works on behalf of its members to help transition the power generation industry towards a clean energy economy. Additionally, Sierra Club members purchase electricity from Georgia Power Company. Their consumption, costs, terms of service for purchase of electricity, and the resources that will ultimately serve them may be affected by the Commission's actions in these dockets. As a result, Sierra Club has substantial interests in the outcome of this proceeding and desires to intervene in order to

protect those interests.[1]

SACE is a regional nonprofit with over 3,600 members in the State of Georgia. SACE also has staff across Georgia. SACE's purposes include education and research concerning the environment, public health, and economic impacts of energy use and policy in the Southeast. Additionally, SACE's members and staff are ratepayers of Georgia Power Company. The Commission's actions in these proceedings will affect the Georgia Power Company's supply system, and directly impact the amount SACE members pay on their electric bills now and possibly for the next 60 years. Therefore, SACE has substantial interest in the outcome of the proceeding, and respectfully requests to participate.

On July 30, 2025, Georgia Power filed an Application for the Certification of the 2029-2031 All-Source Capacity generating resources requesting that the Commission issue an order granting a certificate of public convenience and necessity for the selected generation resources. Also on July 30, 2025, Georgia Power filed an Application for the Certification of Supplemental Resources to be added in the years 2028-2031. On August 5, 2025, the Commission issued its Procedural and Scheduling Order ("PSO") in the above-referenced dockets. Pursuant to that order, Sierra Club and SACE timely file this Application.[2]

The PSO also created the following new requirements:

> the application must (1) identify other intervening parties or intervening party applications whose interest is similar to that of the applicant, along with an explanation of why the identified intervening party or intervening party applicant will not adequately represent the applicant's interest; and (2) state the applicant's present intention to submit direct testimony and by whom and on what subject.

PSO at 4. In response to the PSO's new requirements, Sierra Club and SACE have verified that there are currently no other intervenors with sufficiently similar interests that would adequately represent Sierra Club and SACE's diverse and unique interests. Sierra Club and SACE do not anticipate that other parties would adequately represent their interests in the responsible transition away from fossil fuel-based electric generating plants towards meeting electricity demand with clean energy, and adequate energy planning for

[1] O.C.G.A § 46-2-59 (e)(2).
[2] *Id.* at (c).

both economic interests and public health. The PSO lists a series of questions that the Commission will address during the proceedings, which Sierra Club and SACE are interested in addressing[3] and, to do so, intend to submit direct testimony from Synapse Energy Economics. Sierra Club and SACE's intervention will not delay the proceedings or prejudice the rights of other parties.

All notices, correspondence and copies of orders and other materials should be addressed as follows, and the following should be placed upon the official service list in this proceeding:

Isabella Ariza, Esq.
Sierra Club
50 F Street NW, 8th Floor
Washington, D.C. 20001
(857) 999-6267
isabella.ariza@sierraclub.org

Maggie Shober
Southern Alliance for Clean Energy
PO Box 1842 Knoxville, TN 37901
(865) 235-1448
maggie@cleanenergy.org

Curt Thompson, Esq.
Thompson & Associates Law Firm, PC
3775 Venture Drive, D100 Duluth, GA 30096
(470) 375-6962
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[3] The Commission will address issues including the following: "Should the Commission issue an order approving, denying, or modifying the requests made by the Company in its July 30, 2025 Applications for approval of capacity from the All-Source RFP and from Supplemental Resources identified by the Company outside of the RFP process? After considering the Company's updated B2026 Load Forecast, as well as considering any Staff-proposed Load Forecast or modification or the load forecast or modification proposed by any intervenor, which generation resources need to be certified in this consolidated proceeding? Are the costs associated with Georgia Power's requests reasonable? Do the supplemental resources, identified outside of an RFP process, provide extraordinary advantage to ratepayers, and should Commission discretion be exercised in approving these capacity resources? If a portfolio of resources is developed from capacity available from the All-Source RFP and the Company-identified supplemental resources, what is the optimal portfolio to maximize benefits to ratepayers? Are the alternative terms and contract considerations for the supplemental resources power purchase agreements reasonable?". PSO at 3.

WHEREFORE, Sierra Club and SACE request that the Commission grant this Application.

Respectfully submitted this 13th day of August 2025.

Curt Thompson
Attorney at Law
Thompson & Associates Law Firm, PC
3775 Venture Drive, D100
Duluth, GA 30096
(470) 375-6962
curtbthompson@bellsouth.net

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VERIFICATION OF APPLICATION OF THE SIERRA CLUB AND THE SOUTHERN ALLIANCE FOR CLEAN ENERGY FOR LEAVE TO INTERVENE

Personally appeared before the undersigned officer, duly authorized to administer oaths in the State and County aforesaid, Isabella Ariza, Esq. who, after being duly sworn, deposes and says that she is a Staff Attorney for the Sierra Club and that the facts contained in the foregoing Application for Leave to Intervene are true and correct to the best of her information and belief.

This 13th day of August 2025.

Isabella Ariza, Esq.

Sworn to and subscribed
before me, this 13th day
of August 2025.

Notary Public

My Commission Expires: 4/14/2030

CADEN MCKEE KOONTZ NOTARY PUBLIC DISTRICT OF COLUMBIA Exp. 4/14/2030

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VERIFICATION OF APPLICATION OF THE SIERRA CLUB AND THE SOUTHERN ALLIANCE FOR CLEAN ENERGY FOR LEAVE TO INTERVENE

Personally appeared before the undersigned officer, duly appointed to administer oaths in the State and County aforesaid, Margaret Shober, who, after being duly sworn, deposes and says that she is a Research Director for the Southern Alliance for Clean Energy, and that the facts contained in the foregoing Application for Leave to Intervene are true and correct to the best of her information and belief.

This 13th day of August 2025.

Margaret Shober

Sworn to and subscribed
before me, this 13th day
of August 2025.

Jennifer L. Stachowski
Notary Public

My Commission Expires:
7-7-27

Jennifer L. Stachowski
State of Tennessee Notary Public
Knox County

August 13, 2025

Sallie Tanner
Executive Secretary
Georgia Public Service Commission
244 Washington Street, SW
Atlanta, Georgia 30334
stanner@psc.ga.gov

Re: APPLICATION OF THE SIERRA CLUB AND THE SOUTHERN ALLIANCE FOR CLEAN ENERGY FOR LEAVE TO INTERVENE IN DOCKETS. 56298 AND 56310

Dear Ms. Tanner,

In accordance with the Georgia Public Service Commission's August 5, 2025 Procedural and Scheduling Order, please find attached Sierra Club and SACE's application for leave to intervene in Dockets 56298 and 56310.

If you have any questions, please contact me at 857-999-6267 or isabella.ariza@sierraclub.org.

Respectfully submitted,

*/s/*_____

Isabella Ariza
Staff Attorney
Sierra Club
50 F St NW
Eighth Floor
Washington, DC 20001

CERTIFICATE OF SERVICE

I do hereby certify that I have this 13rd day of August 2025, served the following parties with the foregoing **APPLICATIOM OF THE SIERRA CLUB AND THE SOUTERN ALLIANCE FOR CLEAN ENERGY FOR LEAVE TO INTERVENE** via hand delivery, email and or US mail to all recipients on the service list for this docket.

This August 13, 2025

Curt Thompson
GSBN: 707663
3775 Venture Drive, D100
Duluth, GA 30096
curtbthompson@bellsouth.net

Counsel for Sierra Club and SACE