SOUTHERN ENVIRONMENTAL LAW CENTER

Ten 10th Street NW, Suite 1050
Atlanta, GA 30309

Telephone 404-521-9900
Facsimile 404-521-9909

August 20, 2025

VIA ELECTRONIC DELIVERY

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

Re: Application for Leave to Intervene on Behalf of Georgia Interfaith Power & Light and Southface Energy Institute; Dockets No. 56298, 56310

Dear Ms. Tanner:

Please find enclosed an electronic version of the following Application for Leave to Intervene to be filed in Dockets No. 56298 and 56310 on behalf of Georgia Interfaith Power & Light and Southface Energy Institute.

Respectfully submitted,

Bob Sherrier
Senior Attorney
Southern Environmental Law Center
Ten 10th Street NW, Suite 1050
Atlanta, Georgia 30309
678-686-8487
bsherrier@selc.org

Counsel for GIPL and Southface

STATE OF GEORGIA

BEFORE THE
GEORGIA PUBLIC SERVICE COMMISSION

In Re:	)	
	)	
Georgia Power Company's Application for the Certification of the 2029-2031 All-Source Capacity RFP	)	**Docket No. 56298**
	)	
And	)	
	)	**Docket No. 56310**
Certification of Supplemental Resources for 2028-2031 Capacity	)	
	)	

JOINT APPLICATION OF GEORGIA INTERFAITH POWER & LIGHT AND SOUTHFACE ENERGY INSTITUTE FOR LEAVE TO INTERVENE

Georgia Interfaith Power & Light (GIPL) and Southface Energy Institute (Southface), through counsel, hereby apply to the Georgia Public Service Commission for leave to intervene in the above-referenced dockets pursuant to O.C.G.A. §§ 46-2-59 and 50-13-14 and Commission Rule 515-2-1-.06. In support of this application, GIPL and Southface respectfully show the Commission as follows:

1.

On July 30, 2025, Georgia Power Company filed an Application for the Certification of the All-Source Capacity Power Purchase Agreements and Company-Owned Proposals. It is the largest single request for certification in Georgia Power's history.

2.

On July 30, 2025, Georgia Power also filed a surprise application for the certification of "supplemental" resources that consist of nearly 2,000 additional megawatts of supply-side capacity

not previously approved, or even mentioned, as part of an integrated resource plan—including the 2025 IRP, voted on two weeks prior. Georgia Power seeks waiver of the Commission's competitive bidding process that ensures billpayers only pay for the most cost-effective resources available.

3.

Georgia Interfaith Power & Light is a 501(c)(3) nonprofit organization headquartered in Decatur, Georgia. GIPL represents the interests of communities of faith in promoting environmental justice, energy conservation, energy efficiency, renewable energy, and related sustainable practices. GIPL engages faith communities in the stewardship of Creation. GIPL is a growing organization with more than 350 member congregations across the state of Georgia representing a wide variety of faiths and over 150 congregationally based Green Teams working to advance GIPL's objectives. While several of GIPL's participating congregations are located throughout the Atlanta metropolitan area, many are located in other areas of the State, including the Acworth, Adel, Albany, Athens, Augusta, Brunswick, Canton, Carrollton, Clayton, Covington, Dalton, Darien, Ellijay, Gainesville, Kennesaw, Macon, Newnan, Roswell, Sautee-Nacoochee, Savannah, Valdosta, Warner Robins, and Waycross areas.

4.

GIPL has an interest in these two certification proceedings both on its own behalf and on behalf of its members. Many of GIPL's participating congregations and members of those congregations purchase electricity from Georgia Power Company, both for their places of worship and for their individual residences. Their electricity consumption and costs for electricity will be affected by the Commission's actions in this docket.

5.

Additionally, GIPL's core mission is to inspire and equip communities of faith to organize,

implement practical climate solutions, and advocate across Georgia on issues of climate change, environmental justice, and community resilience. GIPL's mission is thus directly implicated by Georgia Power's supply-side choices as proposed in these proceedings. GIPL's mission is further implicated by the extent to which the Commission and Georgia Power's process for choosing electric resources is transparent and accessible, to provide for member education and engagement in these important policy choices. GIPL intends to address the concerns of both itself and its members regarding how Georgia Power's proposals—and Georgia Power and the Commission's processes—impact both God's Creation and the resulting bills that customers, and in particular low-income customers, pay. GIPL envisions a Georgia where all people live safely in a healthy environment, a stable climate, and resilient communities. As a result, GIPL has substantial and vital interests in the outcome of these proceedings and seeks to intervene to protect these interests. No other party in this case shares GIPL's unique interests.

6.

In furtherance of its interests and on behalf of its members, GIPL has intervened in many prior proceedings before the Commission, including: Georgia Power's 2025 IRP and DSM proceedings, Docket Nos. 56002, 56003; Georgia Power's 2023 Biomass Request for Proposals, Docket No. 44880; Georgia Power's 2023 IRP Update and Application for Certification of Plant Yates Units 8-10, Docket No. 55378; Georgia Power's 2022 Rate Case, Docket No. 44280; Georgia Power's 2022 IRP and DSM proceedings, Docket Nos. 44160, 44161; Georgia Power's 2020 PURPA Avoided Cost proceedings, Docket Nos. 4822, 16573, 19279; Georgia Power's 2019 Base Rate Case, Docket No. 42516; Georgia Power's 2019 IRP and DSM proceedings, Docket Nos. 42310, 42311; the 2017-2018 DSM Working Group and the 2014-16 DSM Working Group, Docket Nos. 41253, 38401; Georgia Power's 2016 IRP and DSM proceedings, Docket Nos. 40161, 40162; Georgia Power's Application for Certification of a Green Energy Program and Green

Energy Pricing Tariff, Docket No. 16573; Georgia Power's 2015 and 2016 Advanced Solar Initiative Prime, Docket No. 38877; the Notice of Inquiry and Workshop to Examine Issues Related to the Value of Renewable Resources and Distributed Energy Resources, Docket No. 39732; Georgia Power's 2010 IRP and DSM proceedings, Docket Nos. 31081, 31082; and Georgia Power's Seventeenth, Eighteenth, Nineteenth, Twentieth/Twenty-First, Twenty-Second, Twenty-Third, Twenty-Fourth, Twenty-Fifth, Twenty-Sixth, Twenty-Seventh, Twenty-Eighth, and Twenty-Ninth Semi-Annual Construction Monitoring proceedings, Docket No. 29849.

7.

Southface is a 501(c)(3) non-profit organization that has promoted energy-, water-, and resource-efficient workplaces, homes, and communities throughout the Southeast for more than four decades. Southface works with consumers, the construction and development industry, and policymakers to advance clean energy goals through education, research, advocacy, and technical assistance. Southface offers market-based solutions that create jobs and support sustainable communities. Southface's members reside across the state.

8.

Southface has extensive expertise in the use and installation of the kinds of energy efficiency and energy management technologies that are the basis of the Company's proposed energy efficiency programs. Southface is one of the leading organizations in the Southeast on how to achieve energy efficiency in buildings. Southface has conducted research and provided education and technical assistance on such technologies for over 40 years. Southface advises companies, nonprofits, communities, and residential customers in Georgia and across the Southeast on how to cost-effectively meet their energy and sustainability goals. Southface brings unique interests and perspectives to these proceedings.

9.

In furtherance of its interests and on behalf of its members, Southface has intervened in many prior proceedings before the Commission, including: Georgia Power's 2025 IRP and DSM proceedings, Docket Nos. 56002, 56003; Georgia Power's 2022 Rate Case, Docket No. 44280; Application for the Certification, Decertification, and Amended DSM Plan, Docket No. 44161; Georgia Power's 2022 IRP, Docket No. 44160; 2020 DSM Working Group, Docket No. 43040; Georgia Power's 2019 Base Rate Case, Docket No. 42516; 2017 DSM Working Group, Docket No. 41253; Georgia Power's 2016 DSM Program, Docket No. 40162; Georgia Power's 2016 IRP, Docket No. 40161; 2014 DSM Working Group, Docket No. 38401; 2011 DSM Working Group, Docket No. 34414.

10.

The interests of GIPL and its participating congregations and Southface are not adequately represented by other parties to these proceedings. Other parties that have applied to intervene do not have interests similar to those of GIPL or Southface. The applicants' intervention would not unduly delay the proceedings or prejudice the rights of other parties.

11.

If this application is granted, GIPL and Southface, through its counsel, intend to participate fully and jointly in this docket, including cross-examining witnesses, potentially filing direct testimony, and filing proposed orders and/or briefs. GIPL and Southface, through counsel, have so far in these proceedings been denied access to trade secret materials by Georgia Power; the absence of the ability to review basic facts about the sources at issue makes it difficult to clearly articulate a full basis for intervention.

12.

GIPL and Southface respectfully request that the following persons receive all notices, correspondence and copies of orders and other materials in this docket, and be placed upon the official service list:

Bob Sherrier
Amitav Kamani
Tia McGee
Southern Environmental Law Center
Ten 10th Street NW, Suite 1050
Atlanta, Georgia 30309
P: (404) 521-9900
F: (404) 521-9909
bsherrier@selc.org
akamani@selc.org
tmcgee@selc.org

WHEREFORE, GIPL and Southface respectfully request that the Commission grant this application for leave to intervene and admit it as a full party of record in these proceedings with all rights attendant thereto.

Respectfully submitted this 20th day of August, 2025.



Bob Sherrier
Amitav Kamani
Southern Environmental Law Center
Ten 10th Street NW, Suite 1050
Atlanta, Georgia 30309
P: (404) 521-9900
F: (404) 521-9909
bsherrier@selc.org
akamani@selc.org

Counsel for GIPL and Southface

VERIFICATION

STATE OF GEORGIA

COUNTY OF FULTON

Personally appeared before the undersigned officer, duly authorized to administer oaths in the State and County aforesaid, **Bob Sherrier**, who, after being duly sworn, deposes and says he is Counsel for Georgia Interfaith Power & Light and Southface Energy Institute and that the facts contained in the foregoing Application for Leave to Intervene are true and correct to the best of his information and belief.

This 19th day of August, 2025.

Bob Sherrier

Sworn to and subscribed before me
this 19th day of August, 2025.

Notary Public

Makallen Kelley
NOTARY PUBLIC
FULTON COUNTY, GEORGIA
My Commission Expires 09/15/2028

CERTIFICATE OF SERVICE

I certify that the foregoing **Application for Leave to Intervene on behalf of Georgia Interfaith Power & Light and Southface Energy Institute** was filed with the Public Service Commission in Dockets No. 56298 and 56310 by electronic delivery on the 20th of August, 2025. An electronic copy of same was served upon all parties listed below by electronic mail as follows:



Bob Sherrier

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

Justin Pawluk
Chris Collado
Jamie Barber
Robert Trokey
Georgia Public Service Commission
244 Washington Street, SW
Atlanta, Georgia 30334
jpawluk@psc.ga.gov
ccollado@psc.ga.gov
jamieb@psc.ga.gov
rtrokey@psc.ga.gov

Joshua W. Combs
Steven J. Hewitson
Brandon F. Marzo
Allison W. Pryor
Troutman Pepper Locke LLP
Bank of America Plaza
600 Peachtree St., N.E.
Suite 3000
Atlanta, Georgia 30308-2216
(404) 885-3000
josh.combs@troutman.com
steven.hewitson@troutman.com
brandon.marzo@troutman.com
allison.pryor@troutman.com

Jeremiah Haswell
Director, Regulatory Affairs
Georgia Power Company
241 Ralph McGill Boulevard, NE
Bin 10230
Atlanta, Georgia 30308
jhaswell@southernco.com

Whit Cox
Simon Mahan
Southern Renewable Energy Association
11610 Pleasant Ridge Rd.,
Suite 103 #176
Little Rock, Arkansas 72223
501-701-0874
whit@southernrenewable.org
337-303-3723
simon@southernwind.org

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, Tennessee 37901
maggie@cleanenergy.org

Curt Thompson, Esq.
Thompson & Associates Law Firm, PC
3 775 Venture Drive, D 100
Duluth, Georgia 30096
(470) 375-6962
curtbthompson@bellsouth.net

Charles B. Jones, III
Lloyd Avram
Georgia Association of Manufacturers
75 Fifth Street NW
Suite 3412
Atlanta, Georgia 30308
(404) 219-9017
cjones@gamfg.org
lavram@gamfg.org

Jeffry C. Pollock
J. Pollock Incorporated
14323 South Outer 40 Road, Suite 206N
Town and Country, Missouri 63017-5734
(314) 878-5814
(314) 878-7339 (fax)
jcp@jpollockinc.com