BEFORE THE PUBLIC SERVICE COMMISSION
STATE OF GEORGIA

CITY OF CARTERSVILLE	)	
	)	
Petitioner,	)	
	)	
v.	)	Docket No. 55973
	)	
GEORGIA POWER COMPANY	)	
	)	
Respondent.	)	

PETITIONER'S MOTION FOR LEAVE TO FILE SUPPLEMENTAL PREFILED DIRECT TESTIMONY

The Notice of Hearing and Scheduling Order in this matter established a deadline of May 19, 2025 to file prefiled direct testimony. The parties, by agreement, extended the deadline until May 23, 2025, and on May 23, 2025, Petitioner filed prefiled direct testimony on behalf of four witnesses. Petitioner's prefiled direct testimony included both testimony and an actual load study, which demonstrated that the customer's electric power needs would be 1.5MW.[1] Prefiled Direct Testimony of Satya Madivala, pp. 3-4 and Ex. P24; Prefiled Direct Testimony of Steve London, pp. 3-4; Prefiled Direct Testimony of Chad Prater, pp. 4-5. Accordingly, Petitioner expected Respondent to stipulate that Atkore's connected load at the time of its initial operation of the premises was 900 kilowatts or greater and proposed such as a stipulation in this matter. See Ex. "A" hereto. To date, however, Respondent has refused to stipulate to this fact.

Again, Petitioner believes that the record already supports a finding that Atkore's connected load at the time of its initial operation of the premises was 900 kilowatts or

[1] The customer is Allied Tube and Conduit Corporation (commonly referred to as "Atkore"). Prefiled Direct Testimony of Steve London, pp. 1-2.

greater. However, because Respondent has refused to stipulate to this fact – and out of abundance of caution – Petitioner commissioned a load study, which was completed in July and is attached hereto as Exhibit "B." Accordingly, Petitioner respectfully requests that it be allowed to supplement its previously-filed prefiled direct testimony to include the testimony of Professional Engineer Gregory A. Rupert and the attached load study.

Petitioner further states that the proceedings in this matter will not be delayed by granting this motion. Petitioner provided the attached load study to Respondent on August 12, 2025. No final hearing is currently scheduled in this matter, as Respondent has filed a motion for summary judgment, which is currently scheduled for hearing on September 11, 2025. Moreover, at least for purposes of the pending motion for summary judgment, Respondent is not disputing that Atkore's connected load at the time of its initial operation of the premises was 900 kilowatts or greater. Finally, should the motion for summary judgment be denied and a final hearing scheduled, Respondent will have had ample time to provide any rebuttal testimony.

This 22nd day of August, 2025.

SMITH CONERLY LLP

/s/ Charles S. Conerly
Charles S. Conerly
Georgia Bar No.: 180720
cconerly@smithconerly.com

ATTORNEYS FOR CITY OF CARTERSVILLE

402 Newnan Street
Carrollton, Georgia 30117
(770) 834-1160 (telephone)
(770) 834-1190 (facsimile)

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the herein and foregoing **PETITIONER'S MOTION FOR LEAVE TO FILE SUPPLEMENTAL TESTIMONY** by e-mail as follows:

Steven J. Hewitson
Allison W. Pryor
Matthew C. Daigle
Troutman Pepper Hamilton Sanders LLP
Bank of America Plaza
600 Peachtree Street, N.E., Suite 3600
Atlanta, Georgia 30308-2216
(404) 885-3000
steven.hewitson@troutman.com
allison.pryor@troutman.com
matt.daigle@troutman.com

This 22nd day of August, 2025.

SMITH CONERLY LLP

/s/ Charles S. Conerly
Charles S. Conerly
Georgia Bar No.: 180720
cconerly@smithconerly.com

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402 Newnan Street
Carrollton, Georgia 30117
(770) 834-1160 (telephone)
(770) 834-1190 (facsimile)

Exhibit “A”

SC | SMITH CONERLY LLP

402 Newnan Street
Carrollton, Georgia 30117
phone: 770-834-1160
fax: 770-834-1190
smithconerly.com

CHARLES S. CONERLY
cconerly@smithconerly.com

May 12, 2025

VIA ALTERNATIVE ELECTRONIC FILING and FEDERAL EXPRESS

Sallie Tanner, Executive Secretary
GEORGIA PUBLIC SERVICE COMMISSION
244 Washington Street, SW
Atlanta, Georgia 30334-5701
stanner@pscv.ga.gov
404-656-4540

Re: City of Cartersville v. Georgia Power Company
Docket No.: 55973

Dear Ms. Tanner:

In accordance with the Notice of Hearing and Scheduling Order in the above-referenced matter, the City of Cartersville hereby identifies the individuals below as its direct testimony witnesses. The City of Cartersville reserves the right to submit rebuttal testimony from these or other witnesses.

Mr. Steve London	(Allied Tube and Conduit Corporation)
Mr. Satya B. Madivala	(Hines Interests Limited Partnership)
Mr. Freddy L. Morgan	(City of Cartersville)
Mr. Chad Prater	(City of Cartersville)

In addition, the City of Cartersville sets forth the following as its proposed stipulations in this matter:

1. The Georgia Public Service Commission ("Commission") has jurisdiction to hear this dispute between the parties pursuant to the Georgia Territorial Electric Service Act, O.C.G.A. §§ 46-3-1 through 46-3-15 (the "Territorial Act"). **[admitted in Georgia Power Company's ("GPC") response and answer ¶¶ 1-2]**
2. The City of Cartersville, Georgia ("Cartersville") and Georgia Power Company ("GPC") are "electric suppliers" as defined in the Territorial Act, O.C.G.A. § 46-3-3(3), and, for purposes of this proceeding, are subject to the jurisdiction of the Commission pursuant to the Territorial Act. **[admitted in GPC's response and answer ¶ 6]**

3. This dispute concerns a premises located at 1181 Cassville White Road, Cartersville, Georgia, (the "Property") upon which is situated a building previously developed for office and warehouse use (the "Building"). **[admitted in GPC's response and answer ¶ 7]**
4. The Property is within GPC's designated service area under the Territorial Act. **[admitted in GPC's response and answer ¶ 8]**
5. On February 24, 2022, GPC began serving the Property with a 300kVa transformer.
6. More recently, a proposal was made to convert the Building into a manufacturing facility (hereinafter the "Project") for Allied Tube & Conduit Corp. ("Atkore"), which manufactures electrical conduit and fittings, cable and cable management systems, infrastructure products, and safety and security products. **[admitted in GPC's response and answer ¶ 10]**
7. During or about June 2023, Atkore approached GPC about supplying electrical power for the Project. **[admitted in GPC's response and answer ¶ 11]**
8. The estimated electrical load for the Project was approximately 1.5MW, which would require a 1500kVa transformer. **[admitted in GPC's response and answer ¶ 12]**
9. The Property has single-metered service, and Atkore has a connected load which is 900 kilowatts or greater.
10. On or about June 20, 2023, GPC reported that it had ordered the transformer for the new project but that it would take 12-18 months to obtain the transformer. **[admitted in GPC's response and answer ¶ 14]**
11. On or about May 1, 2024, GPC set a 1500kVa transformer on the Property and "set up to bore to a kVa unit in the back." **[admitted in GPC's response and answer ¶ 18]**

The undersigned counsel for the City of Cartersville has forwarded the proposed stipulations to counsel for Georgia Power Company and anticipates that the parties will stipulate to a number of facts prior to the July 22, 2025 Pre-Hearing Conference.

If you have any questions, please do not hesitate to call.

Very truly yours,

SMITH CONERLY LLP

Charles S. Conerly

cc: Nancy Gibson (ngibson@psc.ga.gov)
Steven J. Hewitson (steven.hewitson@troutman.com)

Exhibit “B”

Energy Engineering, LLC
109 Lumpkin Way
Canton, GA 30115

Energy Engineering LLC

July 16, 2025

Energy Engineering conducted an electrical load survey of the Atkore manufacturing facility located at 1181 Cassville White Rd NE, White, GA 30184 on Thursday, July 10, 2025. The objective of the load survey was to determine the estimated maximum potential power demand for the facility. This would include all production equipment, support equipment, lighting, HVAC, and plug loads. Any redundant or backup equipment is excluded.

A direct survey of production equipment was conducted, and actual nameplate power consumption or sizing was utilized whenever available. A web search to find or estimate power consumption was conducted for equipment with sufficient nameplate data to identify the manufacturer and model. Building plan drawings were used for quantifying power demand for lighting and HVAC systems. Finally, an estimate of office plug loads was established based on the number of office spaces and typical loading for computers, monitors, and printers.

The details of each item are included in the following pages. Although the counts and equipment sizing is believed to be correct, it is prudent to state that the actual total connected load is likely to fall within a range of the calculated total. Here is a summary of the calculated load and that range.

Connected Load Findings		
Minimum	75%	915 kW
Nominal	100%	1,220 kW
Maximum	125%	1,525 kW

I hereby certify that this report has been prepared in accordance with generally accepted engineering practices. To the best of my knowledge and belief, the information contained herein is accurate, complete, and free of errors.

Greg Rupert
Principal

GEORGIA REGISTERED No. PE026338 PROFESSIONAL ENGINEER GREGORY A. RUPERT

Qty	Name	Name HP	Name kW	FLA	Volts	Phases	Load Factor	kW	Notes
2	Air Compressor			27.6	460	3	100%	38.5	A
1	Compressed Air Dryer			19	115	1	100%	1.9	A
1	B&O Saw - 803 Precision Saw			108	480	3	100%	78.6	A
2	Sealer		0.52				100%	1.0	A
38	Personal Fan			2.3	120	1	100%	9.2	A
1	Plasma Cutter			26	480	3	100%	18.9	A
1	Camfil Air Pollution Control			14	460	3	100%	9.8	A
1	Yaskawa Welding Robot		2				100%	2.0	B
1	Baleigh Plate Roll PR-403			8.7	220	3	100%	2.9	A
1	Tin Knocker Model TK 16 GA Power Flanger	0.75					100%	0.6	B
1	Angle Roller B	6					100%	4.5	B
1	Angle Roller A	6					100%	4.5	B
3	Kemper Air Filter Tower Type 39080201			9.6	460	3	100%	20.1	A
25	Welbee Welder			29.6	460	3	100%	515.9	A
2	Saw PMI-20	7.5					100%	11.2	A
2	Jet Band Saw JWBS-18SFX			15	115	1	100%	3.0	A
2	Chip Collector	3					100%	4.5	A
1	Rousselle 6B-60 Stamping Press	5					100%	3.7	B
2	Edwards 55 Ton Stamping Press	5					100%	7.5	A
1	12" Disc Sander			8	120	1	100%	0.8	A
1	Welder		0.75				100%	0.8	A
1	Chicago Press Brake	7.5					100%	5.6	C
1	U.S Industrial Machiner 13' Press Brake	15					100%	11.2	B,C
1	Wood Mizer			26	230	3	100%	9.1	A
1	Niagara 9' Shear Press	5					100%	3.7	B,C
2	Hydraulic Press	10					100%	14.9	A
2	Rousselle 4B Stamping Press			4.6	460	3	100%	6.4	B,C
1	Saw PMI-18D	7.5					100%	5.6	A
1	20" Jet Floor Drill Press	1					100%	0.7	A
1	Jet Horizontal Cut Off Saw	2					100%	1.5	A
1	Floor Chip Collector	3					100%	2.2	A
1	Trash Compactor	10					100%	7.5	B,C
6	Production Area Computer Monitors		0.02				100%	0.1	B,C
15	Production Printer		0.08				100%	1.2	B,C
1	Stretch Wrapper			15.1	120	1	100%	1.6	A
16	Forklift Charging Stations			19.2	480	3	100%	223.5	A
186	Warehouse Office Lighting North 2X4 (A)		0.055				100%	10.2	D
26	Warehouse Office Lighting North Downlight (B)		0.02				100%	0.5	D
1	Warehouse Office Lighting North 4' Strip (C)		0.045				100%	0.0	D
274	Warehouse High Bay Lighting		0.441				100%	120.8	D
1	RTU 4 Ton		4				100%	4.0	C,D
1	RTU 4 Ton		4				100%	4.0	C,D
1	RTU 2.5 Ton		2.5				100%	2.5	C,D
1	RTU 2.5 Ton		2.5				100%	2.5	C,D
1	RTU 3 Ton		3				100%	3.0	C,D
1	RTU 5 Ton		5				100%	5.0	C,D
1	RTU 5 Ton		5				100%	5.0	C,D
1	RTU 5 Ton		5				100%	5.0	C,D
1	RTU 5 Ton		5				100%	5.0	C,D
1	Office South Lighting		3.5				100%	3.5	C,D
1	Plug Loads		14.1				100%	14.1	C,D
	TOTAL							**1,220**	

Notes Key	
A	Equipment Nameplate
B	Web Search on Make/Model
C	Estimated
D	Drawings

Connected Load Range		
Min	75%	915
Nominal	100%	1,220
Max	125%	1,525