STATE OF GEORGIA

PUBLIC SERVICE COMMISSION

FINAL REPORT OF THE INDEPENDENT EVALUATOR

REGARDING

WINTER 2027-2028 BATTERY ENERGY STORAGE SYSTEM
REQUEST FOR PROPOSALS

October 6, 2025

ACCION GROUP, LLC
244 North Main Street
Concord, New Hampshire 03301
Telephone: 603-229-1644
Fax: 603-225-4923
Email: advisors@acciongroup.com
www.acciongroup.com

TABLE OF CONTENTS

I. EXECUTIVE SUMMARY 1
II. INDEPENDENT EVALUATOR 2
A. ABOUT THE INDEPENDENT EVALUATOR 2
B. THE IE'S ROLE IN THE RFP 3
III. BACKGROUND 3
IV. PROCUREMENT GUIDELINES 4
A. COMPLIANCE WITH FERC GUIDELINES 4
B. PROCUREMENT WEBSITE 8
V. PRE-BID ACTIVITIES 12
A. RFP STANDARD OF CONDUCT 12
B. LIST OF POTENTIAL BIDDERS - RULE 515-3-4-.04 (3)(E) I 13
C. REGISTRATION TO THE RFP WEBSITE 13
VI. RFP DOCUMENTS 14
VII. BID RECEIPT 14
VIII. BID DETAILS 15
A. BIDDERS' EVALUATION FEES ("BID FEES") 15
B. INITIAL CURE PROCESS 16
C. BID SECURITY 16
IX. EVALUATION PROCESS 17
A. OVERVIEW 17
B. EVALUATION METHODOLOGY 17
C. MOCK BIDS 18
D. COMPETITIVE TIER 18
X. TRANSMISSION EVALUATION 19
A. STANDARD TRANSMISSION EVALUATION 19
B. TRANSMISSION ANALYSIS RESULTS VERIFICATION 20
C. COMMUNICATION WITH BIDDERS 20
D. INTERACTION WITH TRANSMISSION ANALYSIS TEAM 20
XI. POST-EVALUATION DISCUSSIONS 21
XII. CONCLUSION 21
CONFIDENTIAL APPENDIX A BID FEES ..... ERROR! BOOKMARK NOT DEFINED.
CONFIDENTIAL APPENDIX B COMPETITIVE TIER AND FINAL SELECTION ERROR! BOOKMARK NOT DEFINED.
CONFIDENTIAL EXHIBIT A ..... ERROR! BOOKMARK NOT DEFINED.
CONFIDENTIAL EXHIBIT B ..... ERROR! BOOKMARK NOT DEFINED.
CONFIDENTIAL EXHIBIT C ..... ERROR! BOOKMARK NOT DEFINED.

FINAL REPORT OF THE INDEPENDENT EVALUATOR
RE: GEORGIA POWER COMPANY'S
WINTER 2027-2028 BATTERY ENERGY STORAGE SYSTEM REQUEST FOR PROPOSALS

October 6, 2025

I. EXECUTIVE SUMMARY

Accion Group, LLC, served as the Independent Evaluator (“Accion” or "IE"), for Georgia Power Company's ("GPC", “Georgia Power” or "the Company”) Winter 2027-2028 Battery Energy Storage System (“BESS”) Request for Proposals ("Winter BESS RFP" or “RFP”). The RFP was developed following the GPC 2023 IRP Update which identified a need for additional BESS capacity resources. The Winter BESS RFP sought 500 MW of BESS capacity to meet these needs. The RFP sought to procure BESS resources in one of two categories:

> *(i) Standalone BESS with grid charging capability that has a transmission interconnection study completed or is in-progress and requires minimal transmission improvements (those that can be completed on or before November 30, 2027); and (ii) BESS with Renewable Resource and grid charging capability located at an existing or previously certified solar site that has a POI that allows winter discharging of the BESS.*[1]

Throughout the RFP process the Commission Staff ("Staff") was intimately involved and worked closely with the IE to ensure the GPSC rules were followed, and that fairness was extended to every Bidder. Participation of the Staff was helpful as it provided perspective that was unique from that of the Company, Bidders, and the IE and throughout the RFP process the Staff was actively involved alongside the IE.

All information about the RFP was provided to potential Bidders and interested parties through the IE Website gpcwinter2027-2028bessrfp.accionpower.com (“Website”). Further details of the IE Website are included in Section IV of this report.

The response from the marketplace was limited, which was expected given the limited scope of the RFP. Ten (10) Bids from six (6) Bidders were received, and nine (9) Bids from five (5) Bidders were evaluated. Four (4) Bids representing 720 MWs were evaluated as BESS with a Renewable Resource projects, while five (5) Bids representing 920 MWs were evaluated as Standalone BESS projects. A total of 1,640 MW were evaluated; details of the number of offers are presented in Sections VII and VIII of this Report, entitled respectively, "BID RECEIPT” and “BID DETAILS."

The IE was available to Bidders throughout the process. The RFP Website provided a direct message feature through which Bidders could contact the IE. The identity of the IE was well publicized, and Bidders could easily contact the IE using a link on each page of the RFP Website. The IE and Staff reviewed all comments and questions posted on the RFP Website, and reviewed each answer prepared by the Evaluation Team in response to questions before each response was sent to Bidders. The IE monitored all post-Bid message exchanges between Bidders and the Evaluation Team. The IE responded to every direct contact on the Website from Bidders. No

[1] RFP at 14.

Bidder contacted the IE claiming the RFP process, Bid process, or any aspect of the RFP was unfair, discriminatory, or in any way was biased for or against any Bidder or type of Bidder.

This RFP was conducted using a pro-forma Power Purchase Agreement ("PPA") and a pro-forma Build-Transfer Agreement ("BTA"). As discussed later in this report, these pro-forma documents were the same as those approved for the GPC 2029-2031 All-Source RFP. From the outset, Bidders were advised that the contracts were not subject to negotiation or material alteration. The IE believes the Commission was correct in requiring unalterable pro-forma contracts be developed and employed for the RFP.

Additional details on the evaluation and ranking of Bids are included in the Confidential Exhibits. In total, 2 BTA Bids, 3 COP Bids, and 5 PPA Bids were submitted for the RFP. One Bidder failed to pay the required Bid Fees, five Bids did not advance to the Competitive Tier when Bidders declined to post required Bid Security, and one Bid withdrew from the process voluntarily, leaving three COP Proposals in the Competitive Tier. Ultimately, one COP Bid was successful in meeting the requirements of the RFP while the remaining two were released from consideration.

The IE believes the RFP was designed to be fair and adhered to the rules of the GPSC. All Bidders had access to the same information at the same time and had multiple opportunities before the Bid process commenced, through the message board and Q&A page, to identify what they believed to be shortcomings in the RFP, and to offer suggestions for making the RFP attractive to competitive Bidding. No Bidder contacted the IE with a complaint about the RFP process, standards or execution. The IE believes the RFP was conducted fairly and that all Bids were evaluated using the same standards and procedures. Further, the IE conducted an independent evaluation of all Bids and concurs with the final selections made by Georgia Power.

II. INDEPENDENT EVALUATOR

A. ABOUT THE INDEPENDENT EVALUATOR

With more than 40 years of in-depth experience in electric, gas, water, and renewable utilities, Accion Group's diverse consortium of consultants provides insightful, candid, and practical advice to the utility industry and their associated government regulatory bodies. Headquartered in Concord, New Hampshire, with a branch office in suburban Washington, D.C. and consulting affiliates nationwide, Accion's specialties range from competitive procurement and utility management to construction monitoring and nuclear decommissioning.

Since its incorporation in 2001, Accion has been routinely involved in high-profile consulting engagements, thus securing a reputation as one of the premier firms providing independent review of utility procurement practices. Accion has served as Independent Evaluator, Independent Monitor, or Independent Observer to state commissions on over 250 competitive solicitations in markets including California, Hawaii, Georgia, Colorado, Montana, North Carolina, South Carolina, Oregon, Florida, Arizona, and Puerto Rico. Accion Group has also assisted utilities in the preparation for, and the conduct of, power supply solicitations in Maryland, Massachusetts, New York, and Nevada. Having reviewed proposals for generation by renewable sources (including wind, solar, bio-mass, wave action, storage, low-head hydroelectric, geothermal, and methane capture), as well as for generation by new-build facilities using nuclear power, natural gas, and coal fuels, Accion's consultants are well-versed in the subtleties of utility procurement practices. Accion's ultimate goal as IE is the same as the purchasing

utility and state regulators: ensuring the solicitation obtains the best deal possible for ratepayers, given current market and regulatory conditions in terms of both price and non-price factors.

B. THE IE'S ROLE IN THE RFP

As IE, Accion reviewed the process designed by the Evaluation Team prior to releasing the RFP. This review included the following:

- The Company's efforts to identify prospective Bidders and publicize the RFP;
- The terms and conditions that would control both the RFP process and any resulting contracts;
- The evaluation criteria and methodology to be employed;
- The procedures employed to ensure that all Bidders would have access to the same information at the same time;
- The form and content of all draft RFP documents; and
- The design and implementation of the affiliate Code of Conduct protocols.

Accion Group designed and operated the Website for the receipt of Bids, which hosted and captured for review all RFP-related information and all Website activity. The Website facilitated Accion's ability to closely monitor communications during the RFP process.

III. BACKGROUND

The purpose of the RFP was to solicit BESS capacity resources to meet the needs identified by GPC in the 2023 IRP Update. This RFP was designed and executed on an expedited schedule in recognition of these needs. The 2023 IRP Update approved by the GPSC allowed this RFP to proceed with exceptions to Commission Rule 515-3-4-.04(3) as allowed in Rule 515-3-4-.04(3)(f). The 2023 IRP Update Order from the Commission allowed the Winter BESS RFP to use the contracts previously approved for the GPC 2029-2031 All-Source RFP. Accordingly, no Comment Period or Bidders' Conference were held for this RFP.

The RFP Service Date was May 1, 2024 and RFP documents including the Request for Proposals ("RFP"), Power Purchase Agreement and Build Transfer Agreement ("BTA") were filed with the Commission for approval on July 22, 2024 and were approved by that body on August 6, 2024 and filed on August 8, 2024. Final documents were posted to the IE Website on August 9, 2024 for all registered users to access. In August 2024, the RFP documents were amended to adjust the Company's BESS Requirements as they related to the sourcing of equipment from the Netherlands, in response to newly identified cyber security concerns involving the source countries for components assembled in that country. These revisions were approved by the Commission and revised RFP documents were posted to the IE Website on September 17, 2024.

The online bid form was available beginning on August 9, 2024. Company-owned Proposals ("COP") and Affiliate Bids were due on September 13, 2024 with all other Bids due September 16, 2024.

The IE completed a conformity review of Bids following the Bid due date. Following this process, the Evaluation Team and IE commenced evaluations of Bids. During this period, clarifying requests were made of Bidders through the RFP Website and extensive evaluation was conducted of each Bid and the transmission impact

of each Bid. The Commission Staff was actively involved in each round of evaluation and kept advised by the IE of each phase of the evaluation. The evaluation process is discussed below.

Once the Competitive Tier was established, GPC, the Staff, and IE held Teams meetings with Bidders who had successfully advanced to the Competitive Tier evaluations. These included meetings with one Bidder who had declined to post Bid Security for one of their Bids but requested to be reinstated in the RFP. Notwithstanding best efforts of GPC, the Staff, and the IE, the Bidder chose not to proceed with any of their Bids. Ultimately, only the 3 COP Bids remained under consideration for the RFP.

IV. PROCUREMENT GUIDELINES

With the cooperation of Staff, Accion Group worked with GPC to design a competitive Procurement Website to securely and efficiently manage the RFP process. Structured on Accion Group's proprietary Procurement Website platform, the underlying principles of the IE's RFP Procurement Website were to execute a solicitation process that met both GPSC and Federal Energy Regulatory Commission ("FERC") standards while providing information to Bidders in an equal, understandable, and transparent manner, and allowing all registrants to participate in the bidding process with confidentiality. To meet GPSC and FERC standards, the IE's Website was designed to provide complete security for confidential documents and anonymity for Bidders, thus avoiding unequal treatment or unfair bias towards or against any Bidder. The Website facilitated exchanges with interested parties before the Bid date, managed the intake of all Bid information, and handled all post-Bid exchanges. During the RFP process, which began May 1, 2024, through the date of this Report, the Procurement Website was accessed 75,955 times and registrants on the RFP Website logged on 3,281 times. The IE believes this shows the robust use of the IE Website confirms the responsiveness of all participants including Bidders and GPC. "Test Accounts" were used by the IE to access the Site for administrative and maintenance tasks.

A. COMPLIANCE WITH FERC GUIDELINES

As a standard practice, Accion applied the FERC standards for competitive solicitations. Accion is a well-known and respected firm with significant experience as an Independent Evaluator or Independent Monitor for competitive solicitations by electric utilities. In the past 24 years Accion served as IE for over 250 solicitations, a number of which were open to affiliate bidding. Accion reports have been submitted to FERC in prior solicitations and consistently found to confirm adherence to FERC solicitation guidelines.

This RFP included the opportunity for affiliates of GPC to participate. Because wholesale sales of electric power by an affiliate must also be approved by FERC, the RFP was designed and implemented in a manner so as to meet the FERC requirements in the event an affiliate was a successful Bidder. In 1991, FERC first articulated these requirements in the case of Boston Edison Company re: Edgar Electric Company.[2] The Edgar case established three criteria that must be met if an affiliate is to be awarded a contract from an RFP: (1) the RFP must be designed and implemented without undue preference for the affiliate; (2) the analysis of proposals received must not favor the affiliate, particularly as to non-price factors; and (3) if the affiliate is selected for a contract, its selection must be based on a reasonable combination of price and non-price factors. These Edgar

[2] *Edgar Electric Company*, 55 F.E.R.C ¶ 61,382 (1991)

criteria were intended to both ensure ratepayers are protected and that transactions with an affiliate are above suspicion. On July 29, 2004, the FERC issued "Order Granting Authorization to Make Affiliate Sales"[3], which remains the standard of today and contained a set of guidelines that FERC uses today to evaluate the fairness of RFPs and ensure it satisfies the Edgar criteria. These guidelines are commonly referred to as the Allegheny guidelines. The Allegheny guidelines are described in the Order as follows:

> *The underlying principle when evaluating an RFP under the Edgar criteria is that no affiliate should receive undue preference during any stage of the RFP. The following four guidelines will help the Commission determine if an RFP satisfies that underlying principle.*
>
> 1. ***Transparency:*** *The competitive solicitation process should be open and fair.*
> 2. ***Definition:*** *The product or products sought through the competitive solicitation should be precisely defined.*
> 3. ***Evaluation:*** *Evaluation criteria should be standardized and applied equally to all Bids and Bidders.*
> 4. ***Oversight:*** *An independent third party should design the solicitation, administer bidding, and evaluate Bids prior to the company's selection.*[4]

Whether serving as IE or Independent Monitor, Accion Group expects utilities to adhere to the highest standards for fairness and openness when conducting a competitive solicitation process. Similarly, Accion expects utilities to establish and follow RFP protocols that are free from actual or perceived bias. To this end, we look to the FERC-established Edgar criteria, along with the standards established by the Commission for competitive bidding, to judge the quality of GPC's RFP process. To ensure transparency and fairness throughout the RFP process, GPC used Accion Group's IE Procurement Website platform to transmit the RFP, all related RFP documents and RFP information, and to communicate with Bidders during the solicitation process. Doing so facilitated GPC's compliance with FERC's Allegheny guidelines and the Commission's rules on Request for Proposals Procedure under Chapter 515-3-4, "Integrated Resource Planning," of the Commission's General Rules.

As IE, Accion found that the Company's procurement process adhered to the FERC-established Allegheny guidelines outlined above. The IE Website functioned in a manner that met the strict protocols of transparency, definition, evaluation and oversight, as defined by FERC. In the remainder of this section, we present a detailed overview of how each of the four FERC Guidelines was met and documented on the Website.

1. Transparency Principle

Transparency is the free flow of information to all parties. (108 F.E.R.C ¶ 61,082 at 23)

The transparency principle requires the RFP process to be open and fair to all participants. The IE Website used for the Winter BESS RFP provided all parties with Procurement Website access to the same information at the same time. Bidders were required to use the Website for access to all information, including documents provided by the Company and answers to questions posed by Bidders. All solicitation information was date-stamped when posted, and all RFP documents and data were able to be accessed by registered users at any time. Whenever a document was uploaded, a question was posed, an answer posted, or a calendar event listed, all

[3] *Allegheny Energy Supply Company, LLC,* 108 F.E.R.C ¶ 61,082 (2004)

[4] 108 F.E.R.C ¶ 61,082 (2004) at 22

registered users of the Website were able to view this information immediately. Automatic emails were sent to every registered user notifying them of the new information available and directing users to the specific site page where it could be located.

> *Instead of individually inviting specific Bidders, the utility should allow all interested parties to Bid on the RFP. All aspects of the competitive solicitation should be widely publicized. (108 F.E.R.C ¶ 61,082 at 23)*

The IE Procurement Website allowed all interested parties to register for complete access to the procurement site. Any individual or company visiting the site was welcomed to submit their registration as a potential Bidder. Additionally, users could register as "non-Bidders" to have full access to the site, except for individualized, confidential Bid Books ("Bid Book"). The IE Procurement Website was available to the public and was also easily accessible via search engine and the Commission's Website. Announcements about the RFP were posted on the Website and available to the public. Registered users were sent automatically generated notices whenever an announcement was posted. The Website preserved a copy of every announcement, even after it was removed from public viewing.

> *"Any communication between RFP issuer and Bidder that are not part of the Bid should be made available to all other Bidders." (108 F.E.R.C ¶ 61,082 at 23)*

All communication between GPC and Bidders that was not specific to an individual Bid was made available to other Bidders through pages accessible on the IE Procurement Website. For example, all users registered to the site were able to access the "Q&A" page, where questions and answers were posted while maintaining Bidder confidentiality. When Bidders posed questions to GPC, the questions, along with the answers, were posted to the "Q&A" page and an automatic email was sent to all registered users alerting them of new communication posted to the site. The Procurement Website's secure data collection feature ensured that the identity of the Bidders posing the questions remained anonymous. All questions posted during the Bidders' Conference were recorded and subsequently posted on the Website, along with answers from GPC.

Any communication between the Bidder and the Evaluation Team relating to the Bidder's specific Bid proposal remained confidential, and was retained in a secure folder accessible only by the Bidder, the Evaluation Team, Staff and the IE.

> *Negotiation may occur after the bidding; for example, when a Short List has been compiled or a winner has been selected. (108 F.E.R.C ¶ 61,082 at 26)*

The Procurement Website was designed to manage the exchange of documents during post-Bid negotiations, mitigating any transparency concerns and providing a continued online conduit for information exchanges during the RFP process. Each Bidder received a secure Bid Book, through which information was exchanged with the Evaluation Team. These Bid Books contain folders specifically designated for all messages between the Bidder and the Evaluation Team, allowing for postings of contracts and negotiation-related communications. All communications and post-Bid negotiations were monitored by the IE, and the IE attended each discussion session, either in person or via teleconference. Each post-Bid document was date-stamped when uploaded to the respective Bid Book, providing the Company and the Commission with a permanent record of the solicitation and related negotiations.

2. Definition Principle

The product or products sought through the RFP should be defined in a manner that is clear and nondiscriminatory. (108 F.E.R.C ¶ 61,082 at 27)

Draft RFP documents were posted on the Website, and anonymous comments were solicited from prospective Bidders through the confidential Message Board, thereby ensuring that the products sought through the RFP were defined in a clear manner understandable to all Bidders. The Website also featured a "Q&A" page on which any registered user to the Website was able to post questions anonymously regarding products being sought in the RFP. The question submitted and the answer provided by the utility, Commission Staff, or the IE, were accessible to registered users immediately after the information was posted.

If there are changes in the product specification, rebids should be allowed.

(108 F.E.R.C ¶ 61,082 at 27)

As there were no changes in the product specification, no Bid refresh was conducted.

3. Evaluation Principle

RFPs should clearly specify the price and non-price criteria under which Bids will be evaluated. (108 F.E.R.C ¶ 61,082 at 29)

The RFP documents provided clear and complete product definitions and full disclosure of the evaluation process. With respect to this aspect of the RFP, no prospective participants submitted questions or clarifications to the IE Website regarding either the product definitions or the evaluation process included in the RFP materials. In addition, Accion Group found the RFP documents to be thorough, accurate, and complete. Thorough RFP documents, opportunity for clarification and questions, and equal access to all information regarding the products sought by GPC gave all prospective participants clear information as to the products being sought and the competitive solicitation process to be employed to evaluate the proposals.

RFP issuer and Bidders will usually need to divulge commercially sensitive information in the solicitation process. (108 F.E.R.C ¶ 61,082 at 31)

In order to ensure confidentiality and security throughout the online bidding process, the Procurement Website featured a 2048 Bit security certificate to ensure the privacy and security of all transactions made through the solicitation platform. Furthermore, every Bidder automatically received a secure Bid Book folder for all Bid-related documents. This Bid Book served as a secure repository of confidential Bid-related information enabling Bidders, the IE, and the Evaluation Team to securely post relevant documents and communications while maintaining Bidder anonymity and ensuring that commercially sensitive information was not inadvertently released to the public or to other Bidders. Only the named Bidder, the IE, certain Commission Staff members, and select members of the Evaluation Team were able to access documents in each Bid Book folder.

In addition, the Website maintained comprehensive logs detailing when a user was logged in, and what actions were taken while on the Website (such as page views or document uploads and downloads). As a result, any questions regarding privacy or questionable access to documents could be answered by reviewing Website access and user logs, which confirm every action taken on the site.

4. Oversight Principle

Effective oversight of competitive solicitations can be accomplished by using an independent third party in the design, administration, and evaluation stages of the competitive solicitation process. (108 F.E.R.C ¶ 61,082 at 32)

Accion's oversight as IE began before the draft RFP was released for public review. All aspects of the RFP were managed through the Website, ensuring security, transparency, and confidentiality, while also creating a permanent log of all RFP activity. All registration, bidding, communication, Q&A, and post-Bid exchanges were handled through the Website's secure online RFP management system, allowing Accion to provide effective oversight of the entire RFP process, and making review of the process possible with date-stamped entries. These Website records and logs serve as a permanent record of Georgia's solicitation process, providing the Evaluation Team and the Commission with the date and time of every action taken by Bidders, the utility, the Commission, and the IE.

A minimum criterion for independence is that the third party has no financial interest in any of the potential Bidders, including the affiliate, or in the outcome of the process. In this context, independence' means that the third party's decision-making process is independent of the affiliate and all Bidders. (108 F.E.R.C ¶ 61,082 at 33)

Accion had no financial interest in any of the potential Bidders, GPC, GPC affiliates, or in the outcome of the process, and would not have accepted this engagement if there had been even the appearance of a conflict of interest. This independence is periodically reviewed by the Commission.

The independent third party should be able to make a determination that the RFP process is transparent and fair. The independent third party's role as the sole link for transmitting information between potential Bidders and RFP issuer would also help to ensure that the RFP design will not favor any particular Bidder, particularly an affiliate. (108 F.E.R.C ¶ 61,082 at 35)

The IE Procurement Website served as the sole link for all interactions between Bidders and the RFP issuer, and provided all Bidders with 24-7, real-time access to updates, documents, announcements, and all Bid-related communications and information. The Website allowed the IE to monitor every question, comment, document upload, and interaction during the solicitation. Because anonymity, confidentiality, and security are fundamental built-in components of the RFP Website platform, the IE is able to make a demonstrably strong judgment as to the fairness of Georgia's RFP process.

B. PROCUREMENT WEBSITE

Once the IE released the RFP Website on May 3, 2024, general information relating to the Winter BESS solicitation was available to the public, and individuals were able to register on the Website as either Bidders or Non-Bidders. Upon registration, each individual received an automatic email notification acknowledging successful registration to the Site along with an individual User ID and automatically generated password.

The Website was designed and employed to prevent the Evaluation Team from knowing the identity of any Bidder, prior to the IE releasing Bids for evaluation after the Bid submission date and the initial Bid confirmation process by the IE. The IE screened messages and questions posted to the site and removed Bidder-specific references to maintain anonymity. After the Bid period closed the IE provided the Evaluation Team with

a “price only” summary of Bids for an initial ranking of Bids. That summary removed all reference to the Bidder and the location of the proposed project. After the summary was reviewed with Staff, the IE provided the Evaluation Team with access to the Bid Books, and all of the information provided by Bidders.

Those who registered as Bidders were automatically provided with a confidential, personal Bid Book and a confidential Message Board which together provided a secure platform through which all communication between the Evaluation Team and Bidders occurred. Once the Bid period closed, the Message Board acted as the vehicle for communication between GPC and Bidders and the Bid Book allowed for exchange of any relevant documents. The Staff had access to the Message Board at the same time as GPC. Interactions were time-and-date stamped and recorded on the IE Website, and involved parties were notified of new messages and uploads. Non-Bidders only had access to public information.

The IE Website also facilitated additional notification to Bidders regarding updates or reminders relating to the RFP. For example, in the days leading up to the RFP deadline, Bidders with partially complete Bids were sent reminders of the due date. These notices further made certain that registrants received the same information pertaining to RFP developments at the same time.

The Evaluation Team, Staff, and Accion collaborated to produce Announcements, Calendar events, Frequently Asked Questions (“FAQ”), RFP documents, and responses posted on the Question and Answer (“Q&A”) page on the Website. The Q&A page ensured that all Bidders had access to all information provided by GPC or the IE during the RFP process in order to provide all registrants with up-to-date information. All registered users of the Website received automatic email announcements whenever an announcement, document or FAQ was posted, and when the schedule was adjusted.

RFP Information was Accessible and Clear

a. Frequently Asked Questions (FAQs)

The FAQs page displayed answers to the most commonly asked questions about the Website and the RFP. GPC's FAQs were accessible to the public and covered topics including RFP Participation, Bid Procedures, Bid Fees, Interconnection, Technology, Website Operation, Evaluation, and what to do if a Bidder had a question that involved confidential information regarding a project. If the answer to a question was not available on this page, Bidders were instructed to check the Q&A page to see if their question was previously answered. If their question was not answered on the FAQs page, they were requested to post their question on the Q&A page, and to not contact the Evaluation Team directly.

b. Questions and Answers (Q&A)

All registered Bidders on the RFP Website had the ability to anonymously submit questions via the online Q&A page, as shown in Figure 1, below.

All Questions and Answers were visible to all public and registered users of the Website immediately after responses were posted. To avoid an inadvertent disclosure of Bidder's information, such as when a Bidder included their name in a question, the IE screened all questions and messages and removed all identifiers before providing them to GPC for responses. The IE established a "GPC Messages" page to transfer Bidder questions to GPC personnel. With this process the Evaluation Team responded to Bidder inquiries via the GPC Messages and after review, the IE posted the answer on the Website Q&A page. When a question was posted, all users received an automatically generated email from the Website with the answer. A screenshot taken from the procurement Website Q&A page showing one question and answer (Ref #1 Posted) is shown in Figure 2. In addition, all questions and answers could be downloaded, printed, and exported to an Excel Spreadsheet.

Figure 1
Question & Answer Feature - Ask a Question

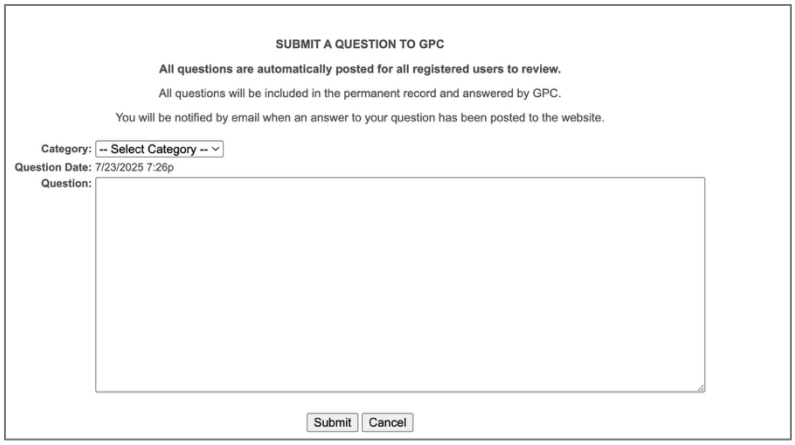


Figure 2

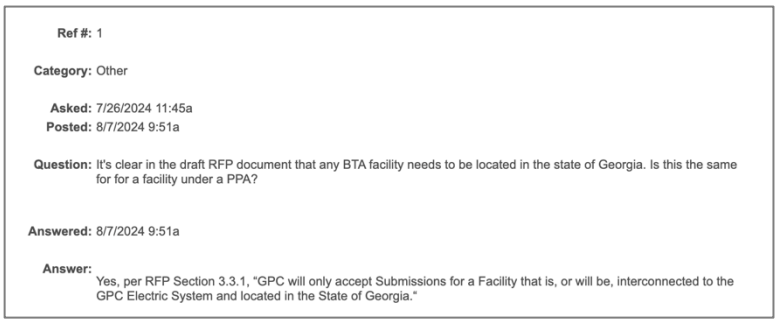
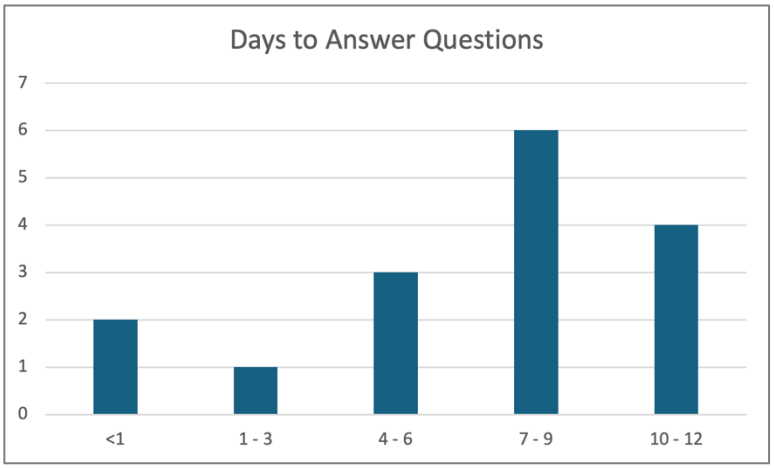


Figure 3



Once the Bid period closed on September 16, 2024, the opportunity to ask questions via the Q&A was closed. Users could still view answered Q&A, but the ability to ask new questions was terminated. Bidders were directed to exclusively use the Message Board to ask questions and communicate with the IE and Evaluation Team regarding their Bid(s).

A total of 17 unique questions were posted on the Q&A page. Before the Bid due date, GPC did not have access to, nor was it aware of the identity of persons asking questions, and the IE monitored and screened Messages to maintain this confidentiality. The anonymity of the Q&A page ensured that all Bidders had immediate access to questions and answers that were posted, and that the Evaluation Team considered questions without regard for the source. The Evaluation Team or the IE

answered all questions, which were also reviewed by Staff.

GPC's goal was to respond to all questions promptly while also reviewing responses with the IE and Staff. In this RFP the average response time was seven (7) days, with all questions answered within 12 days; Figure 3 shows the response time for the Q&A. While the response time for Q&A in this RFP was relatively fast, the IE and GPC have a shared goal of improving the processing time for questions in future RFPs.

The questions raised in the Q&A provided another opportunity for the IE, Evaluation Team, and the Staff to gauge the clarity of the RFP materials. The IE believes the public Q&A feature permitted all Bidders to have access to the same information at the same time.

c. Message Board

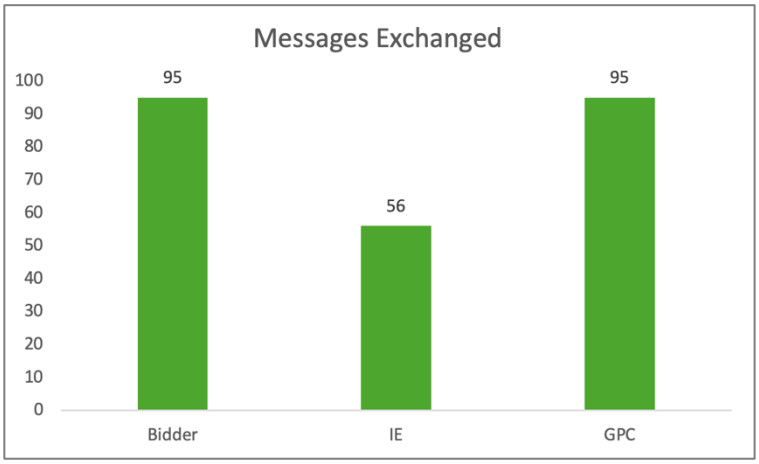
The "Messages" or "Message Board" feature was available for registered Bidders after the launch of the RFP website. On the RFP Website, Bidders could use the "Messages" page to correspond with GPC and the IE. The Company did not have access to the Messages page until after the Bid submission period closed, as this page reveals the identity of the Bidders. Prior to that time, the IE either responded directly to messages or relayed them to GPC after blinding the Bidder's identity. Prior to the Bid due date, the Messages feature was used only for questions that disclosed confidential Bid-specific information, and therefore, could not be asked via the Q&A.[5] All correspondence was monitored by the IE but was not available to persons other than the individual Bidders, Staff, and select members of the Evaluation Team.

The Message Board allowed Bidders to send messages generally or about a specific Bid as well as to respond to messages sent by the IE or GPC. There were instances of emails being sent to GPC personnel from interested persons based on existing relationships established prior to the RFP. In each instance, the Evaluation Team personnel did not respond to the email and immediately referred all inquiries to the IE, who reminded the individual of the Commission Rules. The IE believes the Evaluation Team did not provide information via email or otherwise to any prospective Bidder. All correspondence exchanged via the Message Board was preserved for review by the Commission.

[5] As previously noted, the Q&As on the RFP Website were visible to all registered users, therefore Bidders were asked to pose Bid-specific, or confidential questions using the Message Board, for review by the Company, Staff and IE.

There were 246 messages exchanged via the Message Board on the Website as of July 28, 2025. Bidders submitted 95 messages to the Company, 56 messages were sent by the IE, and 95 messages were submitted by GPC either responding to specific Bidders' questions, requesting Bid clarifications, or providing notice to Bidders about updates to their Bid(s) (See Figure 4). The communications via the Message Board signified there were robust exchanges with Bidders, but more importantly, provides quantified documentation of most of the exchanges without Company or IE filing intervention.

Figure 4



In addition to the confidential Message Board, for problems concerning the RFP process, or for assistance with technical problems on the Website, all Website Users could contact the IE via a link located at the bottom of every page of the Website. Four users contacted the IE five times for assistance. As with the Messages Board, all correspondence exchanged via the Contact link was preserved for review by the Commission.

V. PRE-BID ACTIVITIES

The RFP was structured to strictly respect the protocols established by the Commission. To avoid the inadvertent violation of these protocols, Bidders were advised to avoid attempting direct contact with members of the GPC Evaluation Team, who were clearly identified on Team Lists posted on the Documents page of the IE Website. The Standards of Conduct were clearly established before the RFP was publicly announced and were respected by the Evaluation and the Bid Teams throughout the process. The IE is unaware of any violation of the protocols by either the Evaluation Team or the Bid Team members, from the pre-Bid period through the completion of the RFP.

A. RFP STANDARD OF CONDUCT

a. Background

To the best of the IE's knowledge, the GPC personnel adhered to the strict Standard of Conduct Requirements per the GPSC Rules concerning affiliates.

b. Teams

Individuals involved in the RFP for GPC were identified as being on the Evaluation Team or the COP Team and their names were posted on the IE Website to advise Bidders of the GPC personnel who would not accept any direct contact. To avoid the potential for bias, GPC used an outside independent firm to perform the review of COP proposals. Updated Evaluation Team Lists were posted throughout the RFP process and Bidders were notified each time and updated list was posted.

c. Protocols

The IE believes that no member of the Evaluation Team, nor any Specialized Technical Support personnel was a member of any Affiliate Bid Team as that is defined in GPSC Rule 515-3-4-.04(3), nor have any communication with any member of any Affiliate Bid Team that would be in violation of GPSC Rule 515-3-4-.04(3). Each member of the Evaluation Team and all Specialized Technical Support personnel were familiar with GPSC Rule 515-3-4-.04(3).

GPSC Rule 515-3-4-.04(3)(d) applied to all communications.

B. LIST OF POTENTIAL BIDDERS - Rule 515-3-4-.04 (3)(e) i

When the IE RFP Website was released, a notice was sent to all individuals who previously registered with GPC as desiring to receive notice of RFPs, and to an RFP "contact list" of individuals who registered on the Accion Power Website for notification when the RFP Website was launched. In addition, the IE sent a notice of the RFP to approximately 6,200 individuals who have participated in other solicitations that Accion Group has conducted. That distribution list is the proprietary property of the IE and was provided as a courtesy in this RFP Accordingly, the IE believes adequate public notice of the RFP occurred.

The following Announcement was posted to the RFP Website on May 3, 2024:

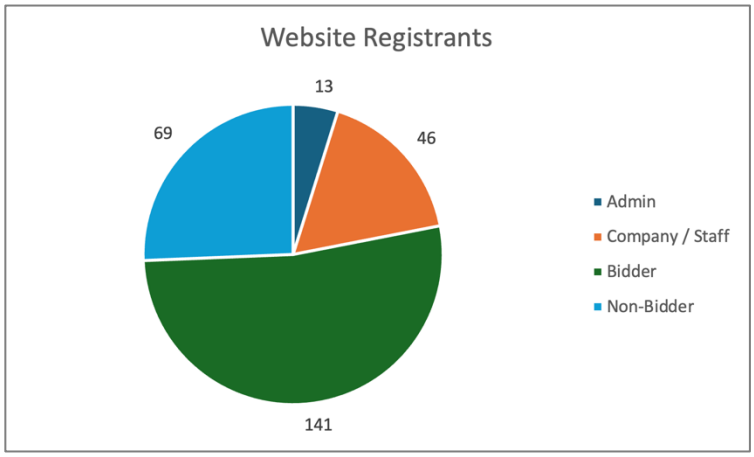
> ***5/3/2024 12:00 PM***
>
> *Georgia Power is pleased to announce the launch of its Winter 2027-2028 BESS Request for Proposals for capacity resources needed in the Winter 2027-2028. This BESS RFP was approved by the Georgia Public Service Commission as part of Georgia Power's 2023 Integrated Resource Plan Update and is designed to procure resources to meet Georgia Power's customers' capacity needs. More information is coming soon. Interested parties are encouraged to become familiar with the IE Website found at gpcwinter2027-2028bessrfp.accionpower.com. Registration is required through the IE Website as it will be the sole means of communication between Georgia Power and interested participants.*

C. REGISTRATION TO THE RFP WEBSITE

The IE is satisfied that GPC used reasonable efforts to advertise this RFP. There were 269 individuals registered on the IE Website from a total of 33 jurisdictions, including Canada. The IE believes this level of interest confirms that developers were aware of this RFP.

The following charts shown in Figure 5 shows the breakdown of all registered users on the Winter BESS RFP Website by category of the registrant.

Figure 5



VI. RFP DOCUMENTS

As previously discussed in this report, the 2023 IRP Update allowed for the Winter BESS RFP to be conducted through an expedited process. The Commission approved the use of the GPC All-Source 2029-2031 RFP contracts, which had undergone a thorough Comment period from the bidding marketplace shortly before the launch of this RFP, to be used in the Winter BESS RFP.

The IE agrees with the appropriateness of this approach. Comments were received on the All-Source RFP Documents between February 26, 2024 and May 20, 2024. As GPC filed their RFP Documents with the GPSC on July 22, 2024, a Comment period for the Winter BESS RFP would have been conducted in the weeks immediately following the All-Source RFP Comment Period, likely providing minimal additional input. This expedited process allowed the Winter BESS RFP to proceed without delay.

VII. BID RECEIPT

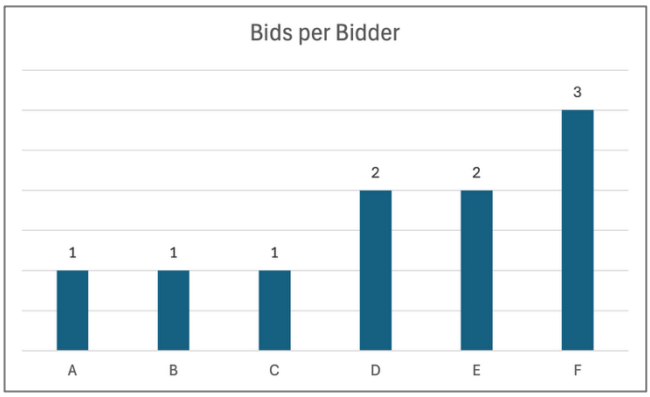
The Bid Form was released on the RFP Website for Bidders to complete on August 9, 2024. All individuals registered on the RFP Website received an email of this Announcement when it was posted to the Announcement Page on the Website.

> *8/9/2024 12:13 PM*
>
> *The Final Approved Winter 2027_2028 BESS RFP Document and Final Approved Pro Forma contracts are now available on the IE Website Document Page. Additionally, the online Bid Form for the Winter 2027_2028 BESS RFP is now available. It can be accessed by using the "Bid Management" tab on the menu bar. Company-Owned Proposals are due no later than September 13th, 2024 at 12:00 PM ET; all other bids are due no later than September 16th, 2024 at 12:00 PM ET.*

Reminder notices were sent automatically from the IE Website to all Bidders 2 weeks, 1 week, 2 business days, and 24 hours in advance of the Bid due date.

Following the Bid deadline, there were a total of 10 Bids submitted by 6 Bidders. No Bidder submitted more than three (3) Bids, and most submitted only one (1). Figure 6 shows the number of Bids submitted by each Bidder.[6] In addition to the Bids submitted, one (1) Bid was started but later deleted, and six (6) Bids were left un-submitted on the RFP website.

Figure 6



VIII. BID DETAILS

A. BIDDERS' EVALUATION FEES ("Bid Fees")

To help defray costs of the evaluation of Bids, a Bid Fee was required of each Bidder for each bid submitted for consideration in the RFP. As stated in the RFP: "*Each Bidder must pay the Bid Fee ($20,000 for each Bid….Bidder must pay the Bid Fee by 12:00 p.m. ET on the Bid Due Date.*" [7] The first ten thousand dollars ($10,000) of each Bid Fee was used to offset a portion of the IE cost. Bid Fees were paid electronically following the instructions provided on the IE Website. BTA Bidders were required to pay an additional $50,000 as a Phase One Due Diligence payment at the time of bidding. COP Bids were not required to pay Bid Fees.

The RFP allowed Bidders the option to submit multiple Bids for one Bid Fee. Alternative Bids were permitted when a project used the same site location and Point of Interconnection ("POI") but differed in one of two ways: (i) form of contract, or (ii) varying PPA Term lengths. Bid Fees in this instance were detailed as follows:

> *If Bidder submits separate Bids that vary regarding certain critical parameters, including contract type, the Site, output, or electrical characteristics, Bidder will be required to pay the Bid Fee ($20,000.00) for each Bid. However, PPA Bids submitted by one Bidder for the same Site, same generation technology, and same size that offer options in the fixed cost components will be considered a single Bid. PPA Bids for 5-, 10-, 15- and 20-year Terms with all performance and variable pricing characteristics remaining the same will be considered one Bid. A maximum of three options will be accepted as a single Bid covered under one Bid Fee.*[8]

[6] As discussed later in this report, not all Bids submitted moved to evaluation. One Bid was submitted but failed to pay Bid Fees and was not advanced to evaluation but is included in this discussion of Bid submissions.

[7] RFP at 22.

[8] RFP at 28.

Bidders who wished to submit an Alternative Bid were given the option to do so on their Bid Management page. Once a Bidder successfully completed a Bid, they could elect to "Create Alternative Bid" which would copy, or "clone," their original Bid and allow the Bidder to adjust only the Bid data as allowed in the RFP. A Bidder who wished to provide the same Bid with different PPA Term lengths, for instance, would find that only that field as well as any directly related data inputs were available to adjust on their "Alternative" Bid. This ensured that no Bid information was inadvertently altered between a Primary and Alternative Bid, thereby giving GPC the confidence to review the Bids directly without having to spend time confirming the Bids were identical in all other respects.

The IE Website was coded to guide Bidders to complete and submit conforming Bids, including as it related to Alternative Bids. In all instances, the IE Website calculated the Bid Fee owed by a Bidder based both upon their configuration of unique or inter-dependent Bids as outlined above.

The IE facilitated receipt of all Bid Fees from Bidders. Bidders received payment instructions via the IE Website and were required to pay fees by no later than 12PM ET on the Bid due date. The IE subsequently underwent a confirmation process to ensure each Bidder both submitted Bid Fees and paid the correct monies. One Bidder failed to pay any Bid Fees, and after repeated outreach from the IE their Bid was subsequently disqualified on September 20, 2024.

Details about Bid Fees are provided in Confidential Appendix A.

Without a Bid Fee, ratepayers would be charged the entire cost of conducting the RFP, including the cost of personnel to review all Bids, regardless of the quality of each Bid. Additionally, without a Bid Fee there would have been no incentive for a Bidder to limit Bids to their best offers, and every incentive to file Bids that were redundant, except for small variations. The IE believes the Bid Fee was both reasonable and equally applied.

B. INITIAL CURE PROCESS

Following receipt of Bids, and concurrent with review of Bid Fees, the IE completed an initial cure process to confirm the most basic aspects of each Bid. This initial review was structured to identify early in the process any major errors in Bid submissions before they could hinder evaluation. The IE generated a unique memo ("Confirmation Memo") for each Bid which was uploaded to its respective Bid Book on September 17, 2024. Bidders were given two (2) business days to review the details of the memo(s) and confirm via the Message Board on the IE Website whether all information was correct.

One (1) Bidder indicated that adjustments, or cures, were needed relating to two (2) Bids following review of the Confirmation Memos. The IE identified an additional discrepancy in a Bid which required cure. Cures were related to contract term, design life of a project, and pricing. The IE worked with each Bidder to selectively unlock fields on the bid form so that the Bidder could adjust their Bid information and re-submit via the IE Website. Both Bidders cured their Bids by September 20, 2024 allowing evaluation of Bids to commence.

C. BID SECURITY

Any Bidder with a Bid selected for the Competitive Tier was required to post a Bid Security within fifteen (15) Business Days. The IE believes this requirement was a successful tool in having only serious Bids considered as part of the Competitive Tier. Bidders could decline to post a Bid Security, and have the associated Bid removed

from consideration, but once the Bid Security was posted, Bidders were committed to keep their Bid(s) available through the final evaluation, and if selected for contracted, were committed to execute a contract or forfeit the value of the Bid Security. This tool was a valuable tool in the effort to ensure that the entire portfolio was filled in accordance with the Solicitation Schedule, and to establish that only committed Bids would be part of the final evaluation.

The Bid Security had to be posted within 15 Business Days in the form of cash, Surety Bond, or Letter of Credit. Each Bidder with a Bid selected for the Competitive Tier that intended to provide a Bid Security in the form of a Surety Bond or a Letter of Credit was required to upload to its bid book a draft (unissued) Surety Bond or Letter of Credit for review and approval by the Evaluation Team before the Bid Security due date. An acceptable Surety Bond Form was available on the IE Website, along with instructions for posting the draft and final Bid Bond.

Competitive Tier notifications were sent on October 10, 2024, and Bidders were advised to provide draft Surety Bonds or Letters of Credit by no later than October 18, 2024 with final Bid Security due no later than 4PM ET on October 25, 2024. On October 16, 2024 and again on October 28, 2024, the Bid Security deadline was delayed. Ultimately, Bid Security was due no later than November 7, 2024.

The Bid Security was fully refundable to the Bidder if such Bid was placed on the Release List, or on the date Seller and Georgia Power executed the PPA for such winning Bid. If the Bid Security was in the form of cash or a Letter of Credit, the Bidder could opt to convert the Bid Security to the required Performance Security at the time of PPA execution. Alternatively, the Bidder could replace the Bid Security with another acceptable form of Performance Security pursuant to the provisions of the PPA. The Bid Security was non-refundable if a Bidder withdrew its Bid or otherwise failed to execute the pro-forma PPA after being selected for the Competitive Tier. Pursuant to the RFP, Bid Security was calculated as either (i) 2% of all revenues during a PPA contract, or (ii) 2% of a BTA purchase price. Three (3) Bidders declined to provide Bid Security for five (5) Bids. This process worked well to have only serious Bidders proceed through the evaluation process and succeeded in having any Bidder fail to execute a proffered PPA.

IX. EVALUATION PROCESS

A. OVERVIEW

RFP bids and bid fees were due on September 16, 2024. Prior to the Bid date, the IE worked with the Company and the Commission Staff to review the Evaluation Methodology and lock down the Model used in the Evaluation. The RFP laid out the Evaluation Methodology in detail in Exhibit H. As discussed in the RFP, each offer would be initially ranked by net total cost to develop a Competitive Tier ranking which would then move forward to the Transmission Evaluation.

B. EVALUATION METHODOLOGY

The IE, Staff, and GPC agreed on a methodology to compare bids for evaluation purposes. The evaluation was based on net costs which represent the net present value of generation and transmission aspects over the life of the asset. The net costs consist of the following components:

- Generation Fixed Costs

- Equity Cost of PPA
- Generation Production Cost Savings
- Transmission Costs

Generation fixed costs include capacity cost payments for PPA bids or revenue requirements for the purchase price of BTA bids and in-services costs for Company owned proposals. The revenue requirements were calculated in the Company's Sam Model which was locked down before bids were due.

Equity costs for PPA represent the equity cost to GPC when the PPA is included on GPC's balance sheet caused by the rating agency treatment of a lease in accordance with FASB ASC Topic 842. The details of the financial lease and operating lease equity cost were calculated in SAM and provided before bids were due.

Generation production costs savings represent the production cost savings the resource provides when added to the baseline system. These calculations are performed in the Company's production cost model and include the charging costs of the BESS resource, any variable O&M component, and facility dispatch characteristics. If the bid included a renewable resource, this renewable generation profile was also included in the simulation to understand its production cost savings. Integration costs were also included in the evaluation in accordance with the RCB Framework as approved by the Commission in Docket 44160.

The net costs of a bid include the fixed costs including any equity costs minus the production cost savings including any integration costs. The total benefit is divided by the capacity contribution of each resource. The capacity contribution of each resource is determined by the Effective Load Carrying Capability (ELCC) of the resource which was approved by the Commission in GPC's 2022 Integrated Resource Plan.

C. MOCK BIDS

As with other RFPs conducted by Accion Group, a mock Bid evaluation was performed using the evaluation model before Bids were due to ensure results from the model were intuitive. Accion developed the "mock bid" process and uses it effectively across the country as a cost-effective way to confirm with the utility and Staff that the modeling was appropriate before Bids are received. This avoids the expense and time of hearings with experts asserting 'my model is better than yours for the following reasons.' This way one model is used, once the data assumptions are confirmed. The mock Bids included 6 Bids with a wide range of project sizes and included both PPAs and COP Bids. The IE reviewed the mock Bid evaluation to assure the Model was working correctly. The evaluation models were then locked down including the production cost model, the SAM model for revenue requirement calculations and equity costs, and finally the evaluation tool which consolidates all components to calculate a final net cost for each offer.

D. COMPETITIVE TIER

Before the final competitive tier was determined, seven of the 10 offers were no longer viable due to withdrawals or failure to post bid fees or bid security. The Company, the IE, and the Commission Staff all reviewed the analysis which left 3 Bids to move on to transmission modeling. The 3 offers represented a total of 700 MW and all three offers were COP bids. Details of the Competitive Tier Bids are available in Confidential Appendix B. Because of the small number of BESS Bids, the evaluation was straightforward.

X. TRANSMISSION EVALUATION

This transmission analysis followed the traditional path that has been established in previous analysis efforts for earlier RFPs. Three Bids were included in the Competitive Tier, and standard analysis documents were completed for each Bid. The driving purpose of this RFP was to obtain additional battery storage that could be operational within a short time period. Each of the three Bids were submitted by Georgia Power Company affiliates, thus no independent Bidders were included in this RFP selection. A full analysis of each Bid was completed to determine which Bids could be successful.

Only one Bid was selected because it was the only one of the three submitted that could be operational within the required timeframe. The successful project was also the one that had the least expensive interconnection and delivery transmission costs.

A. STANDARD TRANSMISSION EVALUATION

The standard evaluation approach and documentation was used in the Bid evaluation process. This approach and documentation has been successfully used in many previous evaluations.

Base Case Determination

The Southern Company Transmission Analysis Team used the same base case for this Winter BESS RFP evaluation as was used in the CARES transmission analysis. These two analyses were run concurrently, thus using the same base case model was appropriate.

Risk Analysis

Since the primary purpose of this RFP was to identify battery storage that could be added to the system during the 2027-2028 Winter time frame, the determination of the risk of achieving this operational objective was paramount to the success of any Bid.

A separate section of the standard transmission analysis document for each Bid shows the basis for and the likelihood of achieving the needed commercial operating date. Only one of the three Bids could be operational within the needed commercial operating date time frame. This data is shown and explained in each of the three confidential exhibits included in this report for each of the three Bids. These reports are included as Exhibits A, B and C. These exhibits show that both of the rejected Bids had excessive operational lead times.

Bid Cost Analysis

The established analysis approach of using load flow analysis to determine system impacts and then determining the cost of overcoming these impacts through the addition of system upgrades was followed in this RFP analysis. The cost of the upgrades was based upon the selection of the standard unit costs for the necessary system components. The interconnection and delivery costs were known and documented before any Bid selection decisions were made. The load flow results, component selection data and component costs for each Bid are all included in Confidential Exhibits A, B and C.

B. TRANSMISSION ANALYSIS RESULTS VERIFICATION

One of the tasks of the IE is to verify that the transmission analysis is completed accurately and fairly for all Bids. This verification is completed using the following forms of verification.

Standard Unit Cost Verification

This analysis was completed concurrently with the CARES evaluation, which included extensive standard unit cost verification efforts. The completion of that cost verification is sufficient to provide credence to the unit costs used for this RFP.

Bid Delivery Cost Verification

The single selected Bid had the only satisfactory operational data and by far the least expensive interconnection and delivery costs. Because of the vast superiority of the single Bid and the fact that all three Bids were from company affiliates, no additional cost verification was deemed to be warranted.

C. COMMUNICATION WITH BIDDERS

For these three bids, all of which were submitted by Southern Company affiliates, no communication with these Bidders was necessary.

D. INTERACTION WITH TRANSMISSION ANALYSIS TEAM

All of the transmission analysis necessary to provide interconnection and delivery costs for the Bids was completed by the transmission analysis team using their existing models which had been calibrated to represent the Southern Company system. Due to the fact this RFP was being conducted simultaneously with the CARES 2023 RFP, the transmission evaluation of the RFPs overlapped, which required particular attention to the proposed in-service date of each Bid. The work product was reviewed by the IE. The verification approach was designed and directed by the IE, while the resulting analysis was completed by the transmission analysis team.

The IE and the transmission analysis team communicated several times each week and held a nearly weekly meeting to discuss analysis progress. These discussions included both CARES and BESS topics. Discussion topics were communicated to the team in advance of the meeting by the IE.

E. COMMUNICATION WITH STAFF

During the process of completing the BESS transmission analysis, the Staff asked some questions about the progress of this analysis that were sent to the IE transmission team. The IE was responsive to each request and worked closely with Staff to review the transmission evaluation as it progressed.

F. TRANSMISSION CONCLUSIONS

In summary, the IE feels that a fair and accurate transmission bid cost evaluation was conducted and that all bidders were treated equally and fairly. Specific comments are as follows:

- Each of the three Bids was individually evaluated with analysis documentation completed for each Bid.
- Transmission interconnection and delivery costs were calculated and provided by the transmission analysis team to the Evaluation Team in a timely manner.

- Confidential Exhibit A contains the analysis results for the selected Bid. It shows that the needed timing for the operational date can be very likely met. Also shown is that this bid is the least expensive to connect.

XI. POST-EVALUATION DISCUSSIONS

Consistent with established protocol, a meeting was held with the proponent to discuss each of the proposals. This was done to confirm details of the proposed project. The IE and Commission Staff attended this meeting and were full participants in the discussions.

XII. CONCLUSION

The RFP produced only one successful proposal to be presented for certification. There were two main reasons for this result. The first was the inability of projects to reach RCOD due to transmission constraints. While transmission could eventually be made available, that was determined to be far beyond the required in service target of the RFP. The other reason for the disappointing results was the great uncertainty created by the proposed, and ultimately implemented, changes in tariffs on imported components. Developers presented Bids using their best cost estimates, only to have those upended by dramatic increases in the cost of imported equipment. Compounding this was the uncertainty created by the continuing fluctuations in the projected tariff rates as the process played out across the globe.

The durations of the evaluation process continue to be detrimental to securing the least cost, most reliable supplies for GPC customers. Bids were received in September of 2024, and the short list was established a full 8 months later. It continues to be unreasonable to expect developers to maintain prices and go 8 months without knowing whether to lock in supply obligations and financing. Certainty produces value, and the inverse is also true: uncertainty increases costs, and in this case resulted in the loss of all Bids from developers. While GPC, Staff and the IE continue to streamline the process in attempts to complete the evaluation process in fewer than 4 months, the IE urges the Commission to encourage and support refinements in the RFP process that will dramatically reduce the time between Bid receipts and the certification filing. As noted above, the overlapping of the evaluation of Bids, especially for transmission review, between this RFP and CARES 2023 underscores the need to sequence RFPs and coordinate with the transmission planning to avoid the need to have extended duration between the Bid submission date and the final selection of successful projects.