Southern Renewable Energy Association
11610 Pleasant Ridge Rd., Suite 103 #176, Little Rock, AR 72223

December 16, 2025

VIA ELECTRONIC DELIVERY

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

Re: Post-Hearing Brief of the Southern Renewable Energy Association in Docket Nos. 56298 and 56310

Dear Ms. Tanner:

Please find enclosed the **Post-Hearing Brief of the Southern Renewable Energy Association** to be filed in Georgia Public Service Commission Docket Nos. 56298 and 56310 regarding Georgia Power Company's Applications for the Certification of Capacity from the 2029-2031 All-Source RFP and Supplemental Resources.

Please contact me at (501) 701-0874 or whit@southernrenewable.org if you have any questions regarding this filing. Thank you for your assistance with this matter.

Respectfully submitted,



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Counsel for SREA

Enclosure
cc: All parties of record in this docket (*via e-mail*)

BEFORE THE

GEORGIA PUBLIC SERVICE COMMISSION

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

SOUTHERN RENEWABLE ENERGY ASSOCIATION POST-HEARING BRIEF

The Southern Renewable Energy Association ("SREA") respectfully submits this Post-Hearing Brief in the above-referenced dockets to provide recommendations to the Georgia Public Service Commission ("Commission") regarding the Georgia Power Company ("Georgia Power") Application for the Certification of Capacity from the 2029-2031 All-Source Request for Proposals ("RFP") and Application for the Certification of Supplemental Resources for 2028-2031 Capacity ("All-Source Certification"), as well as the Stipulation filed by Georgia Power and the Commission Public Interest Advocacy ("PIA") Staff on December 10, 2025.

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BACKGROUND

The Stipulation filed by Georgia Power and the Commission PIA Staff on December 10, 2025, states that it "is intended to resolve all issues in these Dockets."[1] However, the Stipulation does not address the key concerns regarding Georgia Power's RFP process raised in SREA's

[1] Stipulation at 1.

Direct Testimony filed on November 12, 2025,[2] nor does it incorporate SREA's main recommendation for improving Georgia Power's RFP process to foster competition and protect the public interest, as outlined therein.[3] Georgia Power and PIA Staff did not seek input from SREA prior to filing the Stipulation and key matters remain unaddressed and unresolved, warranting Commission action to ensure that Georgia Power's large procurements promote fair market competition by energy suppliers to keep energy in Georgia affordable, clean, and abundant.

While renewable independent power producers ("IPPs") expressed great *initial* interest in Georgia Power's RFP, actual participation from the bid security posting date and onward was anemic. In fact, it was zero. Participation in the Company's Supplemental procurement shows that the problem was not a lack of projects, or even the timing of the RFP; the problem was the RFP design itself. As SREA's witness Makhyoun testified, market participants were deterred by several commercially problematic terms of the RFP's power purchase agreement ("PPA") contracts, which unreasonably put all risk from external tax and tariff changes on project developers and required renewable projects to post much higher collateral than required for gas turbine projects. The net effect was a lopsided RFP that awarded no contracts to renewable market participants, and a Supplemental procurement that lacked any market breadth or competition.

Ms. Makhyoun's testimony recommended several changes that would increase transparency, efficiency, and balance in the Company's RFPs. For example, overly high bid and performance collateral posting should be reduced commensurate with other utilities to encourage, rather than deter, full market participation. Performance security requirements should also be made

[2] *See* Direct Testimony of Miriam Makhyoun on Behalf of SREA at 24-25 (summarizing concerns regarding Georgia Power's RFP Process, including that "[i]f the Company continues to structure RFPs in a way that disproportionately results in the addition of self-build resources and the exclusion of projects developed by independent power producers, the developer community will no longer seek to develop innovative and efficient projects in Georgia that could be beneficial for customers and put downward pressure on rates.")

[3] *See* Direct Testimony of Miriam Makhyoun on Behalf of SREA at 25-28 (providing recommendations for Georgia Power's RFP Process).

more uniform to put energy storage on equal footing with other resources and should be matched with prevailing performance guarantees provided by storage equipment vendors. Finally, contracts should be modified to accommodate changes in tax and tariff law beyond a developer's reasonable control, as is the case with company-owned projects ("COPs").

In light of these and other issues with the current RFP, Ms. Makyhoun further recommended that the Commission limit the share of company-owned resources to 70% , withhold certification of the Wadley COP ESS project, and instead add that project's 260 MW capacity to the upcoming 500 MW ESS RFP. Contrary to suggestions at the hearing, the forthcoming ESS procurement will obtain capacity, energy, and ancillary services, and is open to both 4-hour and 2-hour ESS facilities.[4] The Wadley COP project, which was not selected through competitive solicitation, could be bid into the ESS RFP along with other projects to ensure that ratepayers get the most affordable project available.

RECOMMENDATIONS

To protect the public interest and fulfill its statutory responsibilities, SREA recommends that the Commission should foster a more inclusive, transparent, and competitive procurement environment that drives innovation, lowers project costs, and places downward pressure on customer rates. To that end, the Commission should direct that Georgia Power's subsequently issued RFPs incorporate the following changes, including but not limited to the 2025 Energy Storage System ("ESS") RFP (scheduled to be filed for Commission approval on January 6,

[4] *See* Georgia Power Request for Proposals for Energy Storage System (ESS) Section 2.1 Products Sought. ("GPC seeks offers to sell capacity, including ancillary services and all other Facility attributes, from an ESS . . . with a Storage Device Discharge Duration of at least two hours.")

2026),[5] and the 2026 All-Source RFP (scheduled to be filed for Commission approval in February of 2026):[6]

1. Reduce and shorten bid-security requirements to align with peer-utility practices;
2. Ensure performance-security obligations are comparable across technologies and are consistent with prevailing OEM performance standards;
3. Update the change-of-law framework to provide meaningful recovery for independent developers for prudently incurred cost increases; and
4. Apply consistent terms across all contract types.

These reforms would help restore a level playing field, expand market participation, and ensure that future procurements secure the most cost-effective and reliable resources for Georgia customers.

As demonstrated in SREA's testimony, the recent RFP procurements conducted by public utilities in other states that follow these best procurement practices are also resulting in lower cost projects that are more beneficial for ratepayers (i.e., in the public interest).[7] Likewise, as demonstrated in Georgia's recent PSC elections, affordability is a crucial issue, and the Commission should avail itself of all opportunities available to adopt reforms that will protect Georgia rate payers, such as the opportunities presented in SREA's testimony and highlighted herein.[8] Protecting Georgia Power from competition from independent power producers, including SREA's members, is not an effective strategy for protecting the public interest and putting downward pressure on rates. Therefore, SREA urges the Commission to adopt these recommended

[5] *See* Georgia Power Request for Proposals for Energy Storage System (ESS).
[6] *See* RFP Schedule - Accion Power.
[7] Direct Testimony of Miriam Makhyoun on Behalf of SREA at 25 ("The recent RFP procurements conducted 13 by these public utilities in other states are also resulting in lower cost projects that are more 14 beneficial for ratepayers.")
[8] *See* Direct Testimony of Miriam Makhyoun on Behalf of SREA at 25-28 (providing recommendations for Georgia Power's RFP Process).

RFP reforms so that competition is not arbitrarily inhibited by unnecessary barriers, and our members can bring forward low-cost projects that will put downward pressure on rates and power bills in Georgia.

Finally, SREA recommends withholding certification of the Wadley COP ESS project, and adding that project's 260 MW capacity to the upcoming 500 MW ESS RFP to ensure that ratepayers get the most affordable projects available.

WHEREFORE, SREA respectfully requests that the Commission adopt the recommendations outlined herein.

Respectfully submitted this 16th day of December 2025.

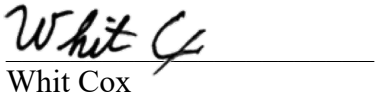
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CERTIFICATE OF SERVICE

I certify that I have served the following parties with the foregoing **Post-Hearing Brief of the Southern Renewable Energy Association,** by electronic mail, on December 16, 2025.



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