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Chairman Jason Shaw
Vice Chair Fitz Johnson
Commissioner Tim Echols
Commissioner Lauren Bubba McDonald
Commissioner Tricia Pridemore

Executive Secretary
Georgia Public Service Commission
244 Washington Street, SW
Atlanta, GA 30334-5701

Re: Response to Georgia Interfaith Power and Light and Southface's Petition to Supplement the Record and for Limited Hearing, Docket 56298 and 56310.

Dear Commissioners:

On December 16, 2025, Georgia Interfaith Power and Light ("GIPL") and Southface Institute ("Petitioner") filed with the Georgia Public Service Commission ("Commission") a Petition to Supplement the Record and For Limited Hearing Concerning Stipulation in Docket Nos. 56298 and 56310 ("Petition"). Georgia Power Company ("Georgia Power" or the "Company") hereby files its response to the Petition and requests that the Commission deny the Petition and approve the Stipulation between Commission Public Interest Advocacy Staff ("PIA Staff") and Georgia Power ("Stipulation"). Pursuant to the Commission's August 5, 2025, Procedural and Scheduling Order ("PSO") in these dockets, this case is to be decided on December 19, 2025. Petitioner has failed to justify its request to ignore the existing PSO and supplement the record or the request for additional hearings. The record is complete and provides sufficient basis upon which the Commission can render a decision. No additional hearings are necessary, and the record in this case supports the adoption of the Stipulation.

Petitioners Allegations are without merit.

During the evidentiary hearings on December 10, 2025, Petitioner made a hearing request seeking workpapers related to the Company's calculation of revenue requirements.[1] Petitioner does not have procedural authority in this proceeding to mandate this type of information at a hearing. Nevertheless, the Company, as a courtesy, routinely works with Parties of record to respond to specific information requests made during the hearings. In this case, the Company explained to Petitioner that the information sought was highly proprietary within the large load contracts themselves and further subject to non-disclosure agreements between the Company and large load customers. The Commission, in its January and April 2025 Orders in Docket No. 44280,[2] previously approved a process whereby it reviews and approves large load contracts to ensure that such contracts are designed to protect existing customers from paying the incremental cost of adding large load customers. This process is not part of these certification proceedings. Notwithstanding, as a courtesy, at the hearing the Company agreed to meet with Petitioner for a second time to explain how the revenue requirements are determined for large load customers. At that meeting, the Company responded to Petitioner's questions and addressed the limited concerns that were raised by Petitioner. None of the information shared or responses given at this meeting support Petitioner's contention that the record in this case is incomplete or justify Petitioner's motion. Moreover, Petitioner's alleged inability to understand the information shared is no basis for supplementing the record or delaying the hearings.

The Record is Complete and ready for a decision.

The consideration of this matter began more than three years ago with the approval of the 2022 Integrated Resource Plan ("IRP"), where the All-Source Request for Proposals ("RFP") was approved to meet capacity needs in the 2029-2031 timeframe. Since that time, the All-Source RFP was issued, responses received, evaluations conducted, and the necessary resources brought forward for certification. Additionally, and contemporaneously with the All-Source RFP, the Commission considered the Company's 2025 IRP, where many of the issues germane to this proceeding were also the subject of litigation in a contested case before the Commission. With the extensive record before the Commission in this case, the record is now closed, and the matter is ready for decision. As stipulated, the Company and PIA Staff recommend certification of each of the resources requested in Docket Nos. 56298 and 56310. The Commission has heard from numerous witnesses in this case regarding the need for capacity, including several PIA Staff and Georgia Power witness panels. These witnesses have thoroughly

[1] Tr. 1319.
[2] *Order Approving Revisions to Georgia Power Company's Rules and Regulations*, Docket No. 44280 (Jan. 28. 2025); *Order on Georgia Power Company's Revision to Rules and Regulations Tariff Compliance Filing*, Docket No. 44280 (Apr. 17, 2025).

testified to the matters identified in the Commission PSO and have provided ample evidence for the Commission to find that it is in the public interest to certify 9,885 MWs of All-Source RFP and Supplemental Resources to meet capacity needs beginning in 2028 and continuing through 2031.[3]

Petitioner, who offered no evidentiary witnesses in this case, realizes that the record does not need to be supplemented to support a decision to certify the resources requested by the Company. That is why Petitioner's "serious concerns" are not directed at the certification of the resources—which are the subject of the present case—but instead Petitioner's motion is a last-ditch attempt to upend the Stipulation by sowing uncertainty into the Company's ability to fulfill its commitment to benefit customers. In the Stipulation, the Company has agreed to provide minimum incremental revenue from large load customers that has at least $8.50 per month of downward pressure on rates in 2029, 2030, and 2031 for the typical residential customer using an average of 1,000 kWh per month. There is no lack of clarity with this commitment. The Company provided information in this case that includes both the revenue requirements for the resources that have been identified for certification as well as the projected revenue anticipated to be collected from large load customers.[4] Moreover, the Commission, through its Staff, is intimately familiar with the large load contracting process, how large loads are priced, and the calculation of estimated revenue requirements to serve them as well as the anticipated revenues associated with those loads through the extensive work undertaken by the Commission and its Staff in Docket No. 44820.[5] This experience and understanding provides clarity to the commitment, and certainty that the commitment will be enforced. The Company will honor this commitment in the Company's next base rate case in 2028. Petitioner will also have the opportunity to review the Company's compliance at that time.

Moreover, contrary to Petitioner's allegations, the commitment the Company made in this case utilizes the same framework the Company utilized in settling the 2023 IRP Update, Docket No. 55378. As in the 2023 IRP Update, the revenues filed by the Company with the Stipulation offset the forecasted revenue requirements for 100% of the resources filed in the All-Source and Supplemental Resources certification proceeding, which are needed to serve more than only large loads. To the extent Petitioner has

[3] *See e.g.,* Direct Testimony of Kristin W. Curylo, Jeffrey R. Grubb, and M. Brandon Looney, Docket Nos. 56298 and 56310 (Aug. 15, 2025); Direct Testimony of Michael A. Bush and Robert B. Hayes, Docket Nos. 56298 and 56310 (Aug. 15, 2025); Direct Testimony of Francisco Valle, Docket Nos. 56298 and 56310 (Sept. 17, 2025); Rebuttal Testimony of Kristin W. Curylo, Jeffrey R. Grubb, M. Brandon Looney, and Francisco Valle Docket Nos. 56298 and 56310 (Nov. 26, 2025); and Rebuttal Testimony of Michael A. Bush and Robert B. Hayes Docket Nos. 56298 and 56310 (Nov. 26, 2025).

[4] *See* STF PIA 7-1.

[5] If the Commission wanted to acknowledge its extensive efforts in other dockets related to large load contracting, which is not necessary for this record to be complete, the appropriate vehicle would be to take notice of those dockets and not delay this proceeding or reopen the evidentiary record.

continued uncertainty regarding the Company's obligations as set forth in the Stipulation, it is not because the record is incomplete.

Petitioner does not need Additional Information for this case to be decided.

The record in this case is complete, and no additional information is needed by the Commission or parties to the case to approve the Stipulation and render a decision. There is ample information in this docket related to both the cost of the resources and revenue requirements for those resources. The PIA Staff and the Company reached an agreement that balances the interest of all customers and ensures long term reliability, while providing the *added* benefit of agreeing to a set level of expected revenues in the next base rate case. The Stipulating Parties presented witnesses that testified regarding the Stipulation, including the commitment in Paragraph 4. Presumably, the Petitioners will be able to participate in that future proceeding. To the extent Petitioner claims they need additional data to ensure compliance with the Stipulation, that argument is more appropriately considered in the 2028 base rate case, where the Company has committed to file in a manner to show at least $8.50 of downward rate pressure for residential customers and where the costs for these resources will be sought for cost recovery for 2029-2031. Further, the Commission and its Staff have thorough experience with the Company's large load contracting process and pricing methodologies and can always issue data requests for additional information should they require it. Because the Commission has all the information and tools it needs to ensure the Company's future compliance with the Stipulation, Petitioner's request should be denied.

Conclusion

For all of the foregoing reasons, the Company requests that the Commission deny the Petition.

Best regards,

By: */s/ Brandon F. Marzo*
Brandon F. Marzo