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EXECUTIVE SECRETARY

Georgia Public Service Commission

(404) 656-4501
(800) 282-5813

244 WASHINGTON STREET, SW
ATLANTA, GEORGIA 30334-5701

FAX: (404) 656-2341
psc.ga.gov

July 24, 2026

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

In the Matter of:

Docket No. 57154: Georgia Power Company's Application for the Certification of the CARES 2025 Utility Scale Renewable Power Purchase Agreements

Dear Ms. Tanner:

On behalf of the Georgia Public Service Commission Public Interest Advocacy Staff, please find enclosed the Direct Testimony of John L. Kaduk and Bobby Iseley.

We have also furnished an electronic copy of this filing to all parties in this proceeding.

Sincerely,

Jamie Barber

Jamie Barber
Director, EERE Unit

Enclosures

Cc: All parties of record (w/enclosures)

BEFORE THE
GEORGIA PUBLIC SERVICE COMMISSION

In Re:

GEORGIA POWER COMPANY'S APPLICATION	**)**	
FOR THE CERTIFICATION OF THE	**)**	**DOCKET NO. 57154**
CARES 2025 UTILITY SCALE RENEWABLE	**)**	
POWER PURCHASE AGREEMENTS	**)**	

DIRECT TESTIMONY

OF

JOHN L. KADUK

AND

BOBBY ISELEY

On Behalf of the
Georgia Public Service Commission
Public Interest Advocacy Staff

JULY 24, 2026

DIRECT TESTIMONY OF
JOHN L. KADUK AND BOBBY ISELEY

IN THE MATTER OF GEORGIA POWER COMPANY'S APPLICATION FOR THE CERTIFICATION OF THE CARES 2025 UTILITY SCALE RENEWABLE POWER PURCHASE AGREEMENTS

I. INTRODUCTION

Q. PLEASE STATE YOUR NAMES AND BUSINESS ADDRESS.

A. Our names are John L. Kaduk and Bobby Iseley. Our business address is 244 Washington Street, SW, Atlanta, Georgia 30334.

Q. MR. KADUK, PLEASE STATE YOUR TITLE, EMPLOYER, EDUCATIONAL BACKGROUND AND WORK EXPERIENCE.

A. I am the Assistant Director of the Energy Efficiency and Renewable Energy ("EERE") Unit with the Georgia Public Service Commission ("Commission"). My educational background and work experience are provided in my resume, which is attached as Public Interest Advocacy Staff ("Staff") Exhibit_ (KI-1).

Q. MR. KADUK, HAVE YOU PREVIOUSLY TESTIFIED BEFORE THIS COMMISSION?

A. Yes. I testified in Docket No. 31081, Georgia Power Company's 2010 Integrated Resource Plan; Docket No. 36498, Georgia Power Company's 2013 Integrated Resource Plan; Docket No. 38877, Georgia Power Company's Application for the Certification of the 2015 and 2016 Advanced Solar Initiative Prime Power Purchase Agreements and Request for

Approval of the 2015 Advanced Solar Initiative Power Purchase Agreements; Docket No. 40161, Georgia Power Company's 2016 Integrated Resource Plan; Docket No. 41596, Georgia Power Company's Application for the Certification of the 2018/2019 Renewable Energy Development Initiative Utility Scale Power Purchase Agreements; Docket No. 41734, Georgia Power Company's Application for the Certification of the 2018/2019 Renewable Energy Development Initiative Utility Scale Power Purchase Agreements for the Commercial and Industrial Program; Docket No. 42310; Georgia Power Company's 2019 Integrated Resource Plan; Docket No. 42625, Georgia Power Company's Application for the Certification of the 2020/2021 Renewable Energy Development Initiative Utility Scale Power Purchase Agreements; Docket Nos. 4822, 16573 and 19279 Georgia Power Company's Avoided Cost Dockets; Docket No. 43814, Georgia Power Company's Application for the Certification of the 2022/2023 Utility Scale Renewable Power Purchase Agreements; Docket No. 55378, Georgia Power Company's 2023 Integrated Resource Plan Update; Docket No. 44880, Georgia Power Company's Application for the Certification of the 2023 Biomass Request for Proposals Power Purchase Agreements; and Docket No. 56002 Georgia Power Company's 2025 Integrated Resource Plan; Docket No. 56181 Georgia Power Company's Application for the Certification of the Clean and Renewables Energy Subscription 2023 Utility Scale Renewable Power Purchase Agreements; and Docket No. 56258 Georgia Power Company's Application for the Certification of the Twiggs County Battery Energy Storage System.

Q. MR. ISELEY, PLEASE STATE YOUR TITLE, EMPLOYER, EDUCATIONAL BACKGROUND AND WORK EXPERIENCE.

A. I am a Utilities Engineer in the EERE Unit with the Commission. My educational background and work experience are provided in my resume, which is attached as Staff Exhibit_ (KI-2).

Q. MR. ISELEY, HAVE YOU PREVIOUSLY TESTIFIED BEFORE THIS COMMISSION?

A. Yes. I testified in Docket No. 55378, Georgia Power Company's Application for Certification of the Robins, Moody, Hammond, and McGrau Ford Phase I and II Battery Energy Storage Systems and Docket No. 56181 Georgia Power Company's Application for the Certification of the CARES 2023 Utility Scale Renewable Power Purchase Agreements.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS PROCEEDING?

A. The purpose of our testimony is to address Georgia Power Company's ("Georgia Power" or "Company") Application for the Certification of the Clean and Renewable Energy Subscription ("CARES") 2025 Utility Scale Renewable Power Purchase Agreements ("PPA") ("Application") that was submitted pursuant to O.C.G.A § 46-3A-4 on June 1, 2026.

Q. PLEASE SUMMARIZE YOUR FINDINGS WITH RESPECT TO THE ISSUES BEFORE THE COMMISSION IN THIS PROCEEDING.

A. In our review, we find that:

1. Georgia Power followed the Request for Proposals ("RFP") process as approved by the Commission on July 29, 2022, in the Order Adopting Stipulation in Docket No. 44160 ("2022 Integrated Resource Plan ("IRP") Final Order") that set out to procure approximately 1,050 megawatts ("MW") of renewable energy and capacity, plus 950 MW of rollover MW, for a total of approximately 2,000 MW through the second phase of this solicitation.

2. The energy and capacity benefits offered from the CARES 2025 Utility Scale PPAs are at a cost below the Company's Best Cost Threshold and will provide benefits to the Company's customers.

3. The CARES 2025 Utility Scale PPAs will provide renewable energy certificates ("RECs") that can be used for the benefit of the Company's customers.

4. The 2022 IRP Final Order approved an additional sum of $4 per kilowatt-year ("kW-year") for the resources procured through the CARES 2025 Utility Scale RFP for the PPA term of such resources.

Q. PLEASE SUMMARIZE YOUR CONCLUSIONS AND RECOMMENDATIONS.

A. Based on our review of the Company's Application, testimony, and our independent analysis, we have the following recommendations:

1. The Commission should certify the five PPAs from the CARES 2025 Utility Scale portfolio that total 752 MW and collectively provide energy, capacity, electrical products, and environmental attributes.

2. The Commission should approve Georgia Power's request for a levelized additional sum of $4 per kW-year for the term of the selected CARES 2025 Utility Scale PPAs, which is

a nominal portfolio amount of $3,008,000 per year. This amount should be adjusted if a PPA terminates earlier than expected or does not reach commercial operation date ("COD").

II. CARES 2025 UTILITY SCALE RFP PROCESS

Q. PLEASE DISCUSS THE PURPOSE OF THE CARES 2025 UTILITY SCALE RFP.

A. The Commission's 2022 IRP Final Order required Georgia Power to procure up to 2,100 MW of Utility Scale renewable resources for customers. The CARES 2025 Utility Scale RFP was issued in 2025 and was the second of two CARES Utility Scale procurements. These resources were procured primarily for customer subscriptions and any resources that are not fully subscribed will be used to serve all retail customers.

Q. PLEASE DESCRIBE THE PROCUREMENT PROCESS USED FOR THE CARES 2025 UTILITY SCALE RFP.

A. Georgia Power drafted the CARES 2025 Utility Scale RFP documents with input from Staff and the Independent Evaluator ("IE"), Accion Group, LLC. All parties met several times to discuss the draft documents prior to the posting of the documents on the IE website. Drafts of the RFP and PPA documents were posted to the IE website on April 16, 2025, to allow for comments on the documents from potential bidders until May 9, 2025. All comments uploaded to the IE website were reviewed by Georgia Power, Staff, and the IE.

The Company drafted responses to be shared with the commenters. Both Staff and the IE reviewed the responses prior to being sent to the commenters by the IE. A Bidder's Conference was held on April 29, 2025, which allowed parties to virtually discuss the CARES 2025 Utility Scale Draft RFP and PPA documents. The Company filed Final Draft RFP and PPA documents on June 20, 2025, for Commission approval.

Q. PLEASE DISCUSS WHAT OCCURRED AFTER THE COMPANY FILED THE FINAL DRAFT RFP AND PPA DOCUMENTS.

A. On June 25, 2025 the Company filed revised documents that were further modified to incorporate the use of on-demand performance bonds as an additional form of acceptable eligible collateral for Upgrade Security.

Q. WHEN WERE THE FINAL DRAFT RFP AND PPA DOCUMENTS APPROVED BY THE COMMISSION?

A. In a memo to the Commission dated June 22, 2025, Staff recommended approval of Georgia Power's Final Draft RFP, Pro Forma Energy Only, Energy with Storage, and Carbon Free Around the Clock ("CFE-ATC") PPAs, and Build Transfer Agreement ("BTA") documents, including the modifications regarding eligible collateral for Upgrade Security. On July 10, 2025 in Docket No. 55952, the Commission approved the Final Draft documents that were filed on June 25, 2025, including the modifications regarding eligible collateral for Upgrade Security.

Q. PLEASE DESCRIBE THE PROJECT REQUIREMENTS THAT WERE USED FOR THE CARES 2025 UTILITY SCALE RENEWABLE RFP.

A. The CARES 2025 Utility Scale RFP was designed to procure renewable resources greater than 6 MW in size with an expected COD as early as 2028. Only greenfield projects were allowed to participate. Additionally, projects with solar plus energy storage devices were allowed to participate. Projects were required to be fueled by a renewable resource and bundled with the environmental attributes and all electrical products produced by or related to the production of such energy.

Projects could be located anywhere in the United States for facilities seeking an Energy Only or Energy with Storage PPA but had to be able to interconnect to the Southern Transmission Territory. Projects for facilities seeking a CFE-ATC PPA or a BTA had to interconnect to the Georgia Power Electric System.

Q. WHEN DID THE RFP PROCESS BEGIN AND HOW MANY UNIQUE BIDDERS BID INTO THE CARES 2025 UTILITY SCALE RFP?

A. The CARES 2025 Utility Scale RFP was released via the IE website on July 1, 2025. The bid period opened on July 1, 2025, and closed on August 22, 2025. There were 22 unique bidders that collectively submitted 70 submissions for a total of approximately 8,500 MW.

Q. WAS GEORGIA POWER AND ITS AFFILIATES ALSO ALLOWED TO PARTICIPATE IN THE RFP?

A. Yes. Both Georgia Power and its affiliate, Southern Power, were allowed to participate in the CARES 2025 Utility Scale RFP.

Q. PLEASE DESCRIBE STAFF'S ROLE DURING THE COMPANY'S BID EVALUATION PROCESS.

A. Staff participated fully throughout the bid evaluation process and independently analyzed the bids received using Georgia Power's evaluation model which had been "locked down" prior to the evaluation process. For the evaluation of projects with unequal contract term lengths, the Company utilized projected avoided costs to be able to evaluate bids on an equivalent basis. This methodology is consistent with what has been done in prior RFPs. Georgia Power's evaluation primarily focused on a bid's economic net benefits, but other qualitative and non-price attributes, such as locating a facility in Georgia Power's service territory, were to be considered, especially when one or more bids offer a substantially similar economic benefit. Staff agreed with the Company's initial competitive tier which did not include system improvement costs.

Q. PLEASE DESCRIBE THE PROCESS USED AFTER THE INITIAL COMPETITIVE TIER HAD BEEN DETERMINED.

A. After the initial competitive tier had been determined, the Company began the process to determine the system impacts for each respective project. This analysis was ongoing during the bid refresh process and was necessary since bidders were only required to include interconnection costs up to the point of interconnection ("POI") in the bid price. System improvements and other interconnection costs beyond the POI were calculated by Southern Company's Transmission Planning Group and reviewed by the IE and Staff. These costs were imputed into the economic value of the bids.

During this evaluation, Georgia Power identified several long-lead time transmission projects required to provide firm transmission service by the expected CODs for most of the proposed facilities. As approved by the Commission as part of the CARES 2023 Utility Scale RFP and incorporated into the Final CARES 2025 Utility Scale Documents, the concept of "Short-Term Network Service" was required for most of the projects.

Q. PLEASE DESCRIBE WHAT HAPPENED AFTER THE INITIAL COMPETITIVE TIER WAS SET.

A. On November 19, 2025, Georgia Power filed amended CARES 2025 Utility Scale RFP pro forma PPAs and BTA that removed the requirement for the posting of Upgrade Security. In Georgia Power's filing, the Company stated that it had determined that it was no longer necessary for RFP participants to post Upgrade Security for system upgrades. Georgia Power also proposed to implement a one-time, limited bid refresh process to provide the opportunity for bidders to reflect any cost savings achieved from the removal of the Upgrade Security requirement. The Commission approved Georgia Power's request for a bid refresh process at the December 2, 2025 Administrative Session.

Q. PLEASE DESCRIBE THE BID REFRESH PROCESS USED FOR THE CARES 2025 UTILITY SCALE RFP.

A. The optional bid refresh process allowed the initial competitive tier bidders who had paid bid security to lower their bid price due to removal of the Upgrade Security requirement and/or extend the COD into the future. The bid refresh window opened on December 4, 2025 and closed on December 11, 2025. No other dates approved in the CARES 2025

Utility Scale RFP's original schedule were impacted with the inclusion of the bid refresh window.

Q. PLEASE DESCRIBE WHAT OCCURRED ONCE THE COMPETITIVE TIER WAS UPDATED.

A. After the competitive tier was updated, the Company identified several portfolios of projects with varying MW amounts and system improvement or Short-Term Network Service costs. The final CARES 2025 Utility Scale portfolio, known as the Short List, was chosen due to the total size of MWs and estimated transmission or Short-Term Network Service costs.

Q. ONCE THE SHORT LIST WAS FINALIZED, HOW WERE THE WINNING BIDDERS NOTIFIED REGARDING THE STATUS OF THEIR BIDS?

A. After the Short List was finalized, parties were notified through the IE website as to the current status of their bid(s). On April 16, 2026, Staff, along with the Company and the IE, met with all of the Short List bidders.

Q. WERE ANY MODIFICATIONS MADE TO THE CARES 2025 UTILITY SCALE PPAS?

A. No. The executed CARES 2025 Utility Scale PPAs included in the Company's Application are the same as what was approved by the Commission on December 4, 2025.

III. CERTIFICATION OF PPAS

Q. PLEASE DESCRIBE THE RENEWABLE RESOURCES FOR WHICH THE COMPANY REQUESTED CERTIFICATION IN THE JUNE 1, 2026, APPLICATION FILING.

A. In Georgia Power's filing, the Company requested a Certificate of Public Convenience and Necessity ("Certificate") for the 5 PPAs selected to fulfill the CARES 2025 Utility Scale portfolio that total 752 MW. In its Application, Georgia Power provided four of the five executed CARES 2025 Utility Scale PPAs. On June 11, 2026 Georgia Power filed the fifth executed PPA in its Supplemental Filing.

Q. PLEASE DESCRIBE THE PROJECTS THAT MAKE UP THE CARES 2025 UTILITY SCALE PORTFOLIO.

A. The projects that make up the CARES 2025 Utility Scale portfolio include:

1. Appling Solar Farm is a 78 MW solar facility located in Appling County, Georgia. The PPA with Appling Solar Farm, LLC has a twenty-year term and is expected to begin commercial operation on November 30, 2030.

2. SR Norwood III is a 150 MW solar facility located in Warren County, Georgia. The PPA with SR Norwood III, LLC has a twenty five-year term and is expected to begin commercial operation on November 30, 2029.

3. SR Wrens is a 194 MW solar facility located in Jefferson County, Georgia. The PPA with SR Wrens, LLC has a twenty five-year term and is expected to begin commercial operation on November 30, 2029.

4. Brightstone Solar is a 130 MW solar facility located in Decatur County, Georgia. The PPA with Brightstone Solar, LLC has a thirty-year term and is expected to begin commercial operation on November 30, 2030.

5. Silverstone Solar is a 200 MW solar facility located in Sumter County, Georgia. The PPA with Silverstone Solar, LLC has a thirty-year term and is expected to begin commercial operation on November 30, 2029.

Q. WHAT IS THE AVERAGE COST OF THE CARES 2025 UTILITY SCALE PORTFOLIO?

A. As provided in the Company's Application, on page 9, the CARES 2025 Utility Scale portfolio was procured at an average cost of approximately 5.36 cents per kilowatt-hour.

Q. DOES STAFF RECOMMEND THE APPROVAL OF THE COMPANY'S REQUEST FOR CERTIFICATION OF THE CARES 2025 UTILITY SCALE PORTFOLIO?

A. Yes. Staff recommends approval of the Company's request to certify the five PPAs from the CARES 2025 Utility Scale portfolio. These projects collectively, provide energy, capacity and the related Environmental Attributes and Electrical Products at a cost below Georgia Power's Best Cost Threshold for the term of the contracts and provides value to the Company's customers.

Q. HOW MANY BIDS REMAIN IN THE 2025 CARES UTILITY SCALE RFP?

A. The are no remaining projects from the CARES 2025 Utility Scale RFP.

IV. ADDITIONAL SUM AND COST RECOVERY OF RFP EXPENSES

Q. HOW WILL THE COMPANY RECOVER THE COSTS RELATED TO THE PROCUREMENT OF THE CARES 2025 UTILITY SCALE PPAS?

A. In the Application, on page 12, Georgia Power stated that it will recover any costs and revenues related to the administration of the CARES 2025 Utility Scale RFP in accordance with the Stipulation approved by the Commission in Georgia Power's Fuel Cost Recovery Application (FCR-27), in Docket No. 56765.

Q. DID THE COMPANY REQUEST AN ADDITONAL SUM IN THIS PROCEEDING?

A. Yes. As stated in the Application, on page 12, the Company requested an additional sum of $4 per kW-year for each CARES 2025 Utility Scale PPA beginning at the facility's COD.

Q. WHAT IS STAFF'S RECOMMENDATION REGARDING THE COMPANY'S REQUEST FOR AN ADDITIONAL SUM FOR THE WINNING CARES 2025 UTILITY SCALE PPAS?

A. In the 2022 IRP Final Order, the Commission approved an additional sum of $4 per kW-year for the resources procured through the CARES 2025 Utility Scale RFP. The Company

has provided Staff with a table containing detailed calculations for the additional sum amount for the CARES 2025 Utility Scale PPAs. Staff has reviewed the calculations and recommends approval of Georgia Power's request for a levelized additional sum of $4 per kW-year for the CARES 2025 Utility Scale PPAs for the term of the PPAs, which is a nominal portfolio amount of $3,008,000 per year. This amount should be adjusted if a PPA terminates earlier than expected or a project does not reach COD.

Q. DOES THIS COMPLETE YOUR TESTIMONY?

A. Yes.

John L. Kaduk
Professional Experience and Educational Background

Mr. Kaduk began his regulatory career with the Georgia Public Service Commission as a cooperative education student in 2000. He graduated from the Georgia Institute of Technology in 2002 with a Bachelor of Science degree in Electrical Engineering. In 2002, Mr. Kaduk was hired as a Public Utilities Engineer in the Telecommunications Unit. In 2006, he joined the Electric Unit, and in 2010 he began working as an Engineer in the Internal Consultants Unit of the Commission as part of the American Recovery and Reinvestment Act group, which later became the Energy Efficiency and Renewable Energy Unit. In 2024, Mr. Kaduk became the Assistant Director of the Energy Efficiency and Renewable Energy Unit. During Mr. Kaduk's career at the Commission, he has participated in numerous cases including Georgia Power Company's 2007, 2010, 2013, 2016, 2019, 2022, 2023 and 2025 Integrated Resource Plans, Georgia Power Company's 2007, 2010, 2013, 2019, and 2022 Rate Cases, and all Georgia Power Company Renewable Request for Proposals and Certifications since 2006.

Mr. Kaduk has testified in: Docket No. 31081, Georgia Power Company's 2010 Integrated Resource Plan; Docket No. 36498, Georgia Power Company's 2013 Integrated Resource Plan; Docket No. 38877, Georgia Power Company's Application for the Certification of the 2015 and 2016 Advanced Solar Initiative Prime Power Purchase Agreements and Request for Approval of the 2015 Advanced Solar Initiative Power Purchase Agreements; Docket No. 40161, Georgia Power Company's 2016 Integrated Resource Plan; Docket No. 41596, Georgia Power Company's Application for the Certification of the 2018/2019 Renewable Energy Development Initiative Utility Scale Power Purchase Agreements; Docket No. 41734, Georgia Power Company's Application for the Certification of the 2018/2019 Renewable Energy Development Initiative Utility Scale Power Purchase Agreements for the Commercial and Industrial Program; Docket No. 42310, Georgia Power Company's 2019 Integrated Resource Plan; Docket No. 42625, Georgia Power Company's Application for the Certification of the 2020/2021 Renewable Energy Development Initiative Utility Scale Power Purchase Agreements; Docket Nos. 4822, 16573 and 19279, Georgia Power Company's Avoided Cost Dockets; Docket No. 43814, Georgia Power Company's Application for the Certification of the 2022/2023 Utility Scale Renewable Power Purchase Agreements; Docket No. 55378, Georgia Power Company's 2023 Integrated Resource Plan Update; Docket No. 44880, Georgia Power Company's Application for the Certification of the 2023 Biomass Request for Proposals Power Purchase Agreements; Docket No. 56002, Georgia Power Company's 2025 Integrated Resource Plan; Docket No. 56181, Georgia Power Company's Application for the Certification of the Clean and Renewables Energy Subscription 2023 Utility Scale Renewable Power Purchase Agreements; and Docket No. 56258, Georgia Power Company's Application for the Certification of the Twiggs County Battery Energy Storage System.

Bobby Iseley
Professional Experience and Educational Background

Mr. Iseley graduated from the University of Florida in 2021 with a Bachelor of Science degree in Electrical Engineering. He received a Master of Science degree in Natural Resources and Energy Policy from the Colorado School of Mines in 2023. In 2023, Mr. Iseley was hired as a Public Utilities Engineer in the Energy Efficiency and Renewable Energy Unit. Mr. Iseley has testified in Docket No. 55378, Georgia Power Company's Application for Certification of Robins, Moody, Hammond, and McGrau Ford Phase I and II Battery Energy Storage Systems and Docket No. 56181, Georgia Power Company's Application for the Certification of the CARES 2023 Utility Scale Renewable Power Purchase Agreements. During Mr. Iseley's time at the Commission, he participated in Docket No. 56002, Georgia Power Company's 2025 Integrated Resource Plan, Docket No. 55378, Georgia Power Company's 2023 Integrated Resource Plan Update, Docket No. 44880, Georgia Power Company's 2023 Biomass Request for Proposals, Docket No. 45084, Georgia Power Company's 2023 CARES Utility Scale Request for Proposals, Docket No. 55623, Georgia Power Company's 2024 Distributed Generation Request for Proposals, Docket No. 44942, Georgia Power Company's 2023 Distributed Generation Request for Proposals, and Docket No. 4822, Capacity and Energy Payments to Cogenerators under PURPA.

BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION

In the Matter of	)	
	)	
Georgia Power Company's Application for the Certification of the CARES 2025 Utility Scale Renewable Power Purchase Agreements	)	**Docket No. 57154**
	)	
	)	

CERTIFICATE OF SERVICE

I hereby certify that the foregoing **Direct Testimony of John L. Kaduk and Bobby Iseley** in the above-referenced docket was filed with the Commission's Executive Secretary, an electronic copy of same was served upon all parties and persons listed below via electronic mail, or unless otherwise indicated, as follows:

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

Jeremiah Haswell
Director, Regulatory Affairs
Georgia Power Company
Bin 10230
241 Ralph McGill Boulevard, NE
Atlanta, GA 30308-3374
jhaswell@southernco.com

Cheryl Johnson
Regulatory Affairs, BIN 10230
Georgia Power Company
241 Ralph McGill Blvd NE
Atlanta, GA 30308
cljohnso@southernco.com

Chris Collado
Staff Attorney
Georgia Public Service Commission
244 Washington Street, S.W.
Atlanta, GA 30334
ccollado@psc.ga.gov

Allison W. Pryor
Troutman Pepper Locke LLP
600 Peachtree Street NE, Suite 3000
Atlanta, GA 30308
allison.pryor@troutman.com

So certified, this 24th day of July 2026.

Jamie Barber
Director, EERE Unit