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Docket # 57171
Document # 227977

COMMISSIONERS:

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August 20, 2026

Jeremiah Haswell
Director, Regulatory Affairs
Georgia Power Company
Regulatory Affairs Bin 10230
241 Ralph McGill Blvd., N.E.
Atlanta, Georgia 30308-3374

RE: Docket No. 57171 / Real Time Pricing ("RTP") Revenue Credit and Allocation Methodology

Data Request from Commission Staff (STF-JKA-4)

Dear Mr. Haswell:

Enclosed herewith, please find Commission Staff Data Request **STF-JKA-4.** Georgia Power's initial responses to this Data Request package are requested as soon as possible, but not later than **September 21, 2026.**

If you have any questions concerning this transmittal, please contact Tom Newsome at 404-656-6575.

Sincerely,

Tom Newsome
Director
Utility Finance

BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION

Georgia Power Company's	**)**	
Real Time Pricing ("RTP") Revenue Credit and	**)**	**Docket No. 57171**
Allocation Methodology	**)**	

STAFF'S DATA REQUEST STF-JKA-4 TO
GEORGIA POWER COMPANY

Jeremiah Haswell
Director, Regulatory Affairs
Georgia Power Company
Regulatory Affairs Bin 10230
241 Ralph McGill Blvd., N.E.
Atlanta, Georgia 30308-3374

COMES NOW the Staff of the Georgia Public Service Commission ("Commission") and, pursuant to the authority vested in it by the Commission pursuant to O.C.G.A. § 46-2-57, herein propounds the following interrogatories and requests for production of documents (collectively, "data requests"), **to be answered under oath** by designated representatives or agents of Georgia Power Company. Staff requests that a complete set of the responses and supporting documents be filed with the Commission's Executive Secretary in the manner set forth in Utility Rule 515-2-.04(4). Staff requests that an original and five (5) copies be filed with the Executive Secretary of the Commission. **Accompanied therewith shall be an electronic version of the filing, which shall be made on a 3 ½ inch diskette or a CD ROM containing an electronic version of its filing in Microsoft Word® for text documents or Excel® for spreadsheets.** As contemplated by law, responses to these Data Requests are expected from Georgia Power Company on or before **September 21, 2026.**

DEFINITIONS

As may be used in this document:

1. "The Company", "Georgia Power" or "The Utility" means Georgia Power Company and its present and former officers, employees, agents, representatives, directors, and all other persons acting or purporting to act on behalf of said Company.

2. The term "you" and "your" refer to "the Company."

3. The term "person" means any natural person, corporation, corporate division, partnership, other unincorporated association, trust, government agency, or entity.

4. The term "document" or "documentation" shall have the broadest possible meaning under applicable law. "Document" or "documentation" means every writing or record of every type and description that is in the possession, custody or control of the Company including, but not limited to, correspondence, memoranda, e-mails, drafts, workpapers, summaries, stenographic or handwritten notes, studies, notices, publications, books, pamphlets, reports, surveys, minutes or statistical compilations, computer and other electronic records or tapes or printouts, including, but not limited to, electronic mail files; and copies of such writing or records containing any commentary or notation whatsoever that does not appear in the original. The term "document" or "documentation" further includes, by way of illustration and not limitation, schedules, progress schedules, time logs, drawings, computer disks, chart projections, time tables, summaries of other documents, minutes, surveys, work sheets, drawings, comparisons, evaluations, laboratory and testing reports, telephone call records, personal diaries, calendars, personal notebooks, personal reading files, transcripts, witness statements and indices.

5. The term "referring or relating to" means consisting of, containing, mentioning, suggesting, reflecting, concerning, regarding, summarizing, analyzing, discussing, involving, dealing with, emanating from, directed at, pertaining to in any way, or in any way logically or factually connected or associated with the matter discussed.

6. "And" and "or" as used herein shall be construed both conjunctively and disjunctively and each shall include the other whenever such construction will serve to bring within the scope of these discovery requests any information that would not otherwise be brought within their scope.

7. The singular as used herein shall include the plural and the masculine gender shall include the feminine and the neuter.

8. "Identify" or "identifying" or "identification" when used in reference to a person other than a natural person means to state: the full name of the person and any names under which it conducts business; the present or last known address of the person; and, the present or last known telephone number of the person.

9. "Identify" or "identifying" or "identification" when used in reference to a document means to provide with respect to each document requested to be identified by these discovery requests a description of the document that is sufficient for purposes of a request to produce or a subpoena duces tecum, including the following:

a) the type of document (e.g., letter, memorandum, etc.);

b) the date of the document; the title or label of the document;

c) the Bates number or other identifier used to number the document for use in litigation; the identity of the originator;

d) the identity of each person to whom it was sent;

e) the identity of each person to whom a copy or copies were sent;

f) a summary of the contents of the document;

g) the name and last known address of each person who presently has possession, custody or control of the document;

h) if any such document was, but is no longer, in your possession, custody or control or is no longer in existence, state whether it: (1) is missing or lost; (2) has been destroyed; or (3) has been transferred voluntarily or involuntarily, and if so, state the circumstances surrounding the authorization for each such disposition and the date of such disposition.

10. "Identify", "identifying" or identity" when used in reference to a communication should be read to include information regarding the date of the communication, whether the communication was written or oral, the identity of all parties and witnesses to the communication, the substance of what was said and/or transpired and, if written, the identity of the document(s) containing or referring to the communication.

INSTRUCTIONS

1. If you contend that any response to any data request may be withheld under the attorney-client privilege, the attorney work product doctrine or any other privilege or basis, please state the following with respect to each such response in order to explain the basis for the claim of privilege and to permit adjudication of the propriety of that claim:
    a. the privilege asserted and its basis.
    b. the nature of the information withheld;
    c. the subject matter of the document, except to the extent that you claim it is privileged.
2. **The answers provided should first restate the question asked and also provide the name of the Company employee(s) or agents responsible for compiling and providing the information contained in each answer.**
3. These data requests are to be answered with reference to all information in your possession, custody or control or reasonably available to you. These discovery requests are intended to include requests for information, which is physically within your possession, custody or control as well as in the possession, custody or control of your agents, attorneys, or other third parties from which such documents may be obtained.
4. If any data request cannot be responded to or answered in full, answer to the extent possible and specify the reasons for your inability to answer fully.
5. These data requests are continuing in nature and require supplemental responses should information unknown to you at the time you serve your responses to these interrogatories subsequently become known.
6. **If you contend that any response to any data request may be withheld under the attorney-client privilege, the attorney work product doctrine or any other privilege or basis, please state the following with respect to each such response in order to explain the basis for the claim of privilege and to permit adjudication of the propriety of that claim:**
    a) the privilege asserted and its basis.
    b) a log should be provided identifying starting and ending bates numbers.
    c) the nature of the information withheld;
    d) the subject matter of the document, except to the extent that you claim it is privileged.
    e) a description of the document to which the privilege applies.

STF-JKA-4-1 Refer to the Company's Direct Testimony of Dr. Ross Beppler, Lee Evans, and Brandon Looney, p. 16, lines 8-11.

a. Please provide all calculations and workpapers used to calculate the estimated impact of the $102 per year downward pressure on rates for an average 1,000 kWh customer.

b. What forecasted revenues, sales, and revenue requirements were assumed in the Company's analysis?

c. Was a cost of service study performed? If so, please provide. If not, please explain how the company can anticipate impacts without a cost of service study to understand the rate class dynamics and impacts of additional costs and revenues for a future forecasted period (2029 – 2031)?

STF-JKA-4-2 Refer to the Company's Direct Testimony of Dr. Ross Beppler, Lee Evans, and Brandon Looney, p. 15, lines 10-13.

a. Provide all analysis performed assessing the spread between marginal and average running costs of the system and the volume of load priced at RTP.

b. Please provide the 2025 evaluation of actual data and capital substitution contribution referenced at line 13.

c. If additional evaluations were done for other years, months/hours of the historic period, please provide all analysis conducted evaluating the behavior and spread. If no analysis was performed, explain how the Company can state it knows the capital substitution component "will vary from year to year?"

STF-JKA-4-3 Regarding the Company's Direct Testimony related to new FT costs

a. The Company's Direct testimony at p. 14 l. 10 states, "The Company is distinguishing new FT from existing FT in recognition that the growth of large load customers is a primary driver of new FT costs and they may need to be treated differently. As with the non-dispatchable PPAs, **existing FT costs are not driven by large load**

growth." (emphasis added) It is true that existing FT costs are not driven by new large load growth, but does the Company believe existing FT costs should be exclusively assigned to non-RTP customers, despite collecting revenues for fixed FT from RTP customers? Please explain.

b. The Company's Direct Testimony at p. 16, lines 20-22 states, "The Company proposes that the costs of new FT attributable to large load customers be fully recovered from those customers and not borne by non-large load customers in the FCR clause." Why didn't the Company propose that the costs of existing FT attributable to existing RTP customers be fully recovered from those customers and not borne by non-RTP customers?

STF-JKA-4-4 Refer to the Company's Direct Testimony of Dr. Ross Beppler, Lee Evans, and Brandon Looney, p. 17, lines 6-10.

a. Would the Company's proposal using a winter 1-CP allocation of FT costs be used to allocate all FT costs for every month that FT costs are incurred during the year? Please explain.

b. How would the Company allocate FT costs between the base and fuel revenues? Would the allocation be done on a historic basis with non-RTP customers responsible for the monthly FT cost until the winter peak month occurs? Please explain.

c. Would the Company differentiate between winter peaking generating capacity with fuel oil back-up versus generating capacity that relies on natural gas FT during the winter season? Please explain.

d. How would the Company differentiate between organic growth and large load demand growth for allocation purposes? What metrics, time periods, or rate schedules would be contemplated? Please explain.

e. Would the Company assign the "large load demand growth" FT costs to a specific rate schedule (e.g. RTP-HA, RTP-DA, TOU-SC-MAC)? Please explain.

STF-JKA-4-5 Refer to the Company's Direct Testimony of Dr. Ross Beppler, Lee Evans, and Brandon Looney, p. 18, lines 11-13.

a. Please confirm that the RTP fuel credit under this second option would still be performed hourly and still rely on marginal fuel price (e.g. spot commodity gas pricing) for dispatchable technologies (e.g. natural gas combined cycles)

b. Please confirm that the RTP fuel credit under this second option would still be based on an average of GPC generating units and purchases.

c. Please confirm that the RTP fuel credit under this second option would fluctuate with market pricing dynamics. For example, please confirm that RTP fuel credit would rise when system lambda rises, and RTP fuel credit would fall when system lambda falls. If not, explain why not.

BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION

In the Matter of	)	
	)	
Georgia Power Company's	)	
Real Time Pricing ("RTP") Revenue Credit and	)	**Docket No. 57171**
Allocation Methodology	)	
	)	

CERTIFICATE OF SERVICE

I hereby certify that the foregoing **Staff's Data Request STF-JKA-4** 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:

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So certified, this 20th day of August 2026.

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Tom Newsome
Director
Utility Finance