FILED
08/24/2026
Executive Secretary G.P.S.C.

Docket # 56765
Document # 227979

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August 24, 2026

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

RE: Docket No. 56765 / Georgia Power Company's Fuel Cost Recovery (FCR-27) Application

Data Request from Commission Staff (STF-PIA-7)

Dear Mr. Haswell:

Enclosed herewith, please find Commission Staff Data Request **STF-PIA-7.** Georgia Power's initial responses to this Data Request package are requested as soon as possible, but not later than **September 23, 2026.**

If you have any questions concerning this transmittal, please contact Jamie Barber at 404-651-5958.

Sincerely,

Jamie Barber
Director
EERE Unit

BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION

Georgia Power Company's	**)**	
Fuel Cost Recovery (FCR-27) Application	**)**	**Docket No. 56765**

STAFF'S DATA REQUEST STF-PIA-7 TO GEORGIA POWER COMPANY

Jeremiah Haswell
Director, Regulatory Affairs
Georgia Power Company
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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 23, 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-PIA-7-1 Please refer to STF-JKA-3-12 Attachment F in Docket No. 56765. Within the database tab, the Company assumes a similar load profile for each data center as well as the same load factor. Please answer the following questions:

a. Does the Company know the type/activity of each data center that is being constructed (i.e., AI inference, cloud & enterprise, or AI training)?
b. Is it the Company's understanding that the type of data center substantially impacts its load profile and load factor?
c. Provide all research the Company has conducted on different types of data centers and the relationship to their load factors and load profiles.
d. Does the Company use the same load profile and load factor for every large load contract's RIM?
e. Provide all support the Company has for using the same load profile and load factor for large customers for the RIM.

STF-PIA-7-2 Please refer to STF-JKA-3-12 in Docket No. 56765. Explain the theoretical justification for using the RIM test to inform the fixed and marginal costs that should be recovered from a large load customer.

STF-PIA-7-3 Please refer to STF-JKA-3-12 in Docket No. 56765. How does the RIM test estimate long run marginal cost? If no such estimate is made, how is the Company confident that long run marginal costs are being covered by the large load customer?

BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION

In the Matter of	)	
	)	
Georgia Power Company's	)	
Fuel Cost Recovery (FCR27) Application	)	**Docket No. 56765**
	)	
	)	

CERTIFICATE OF SERVICE

I hereby certify that the foregoing **Staff's Data Request STF-PIA-7** 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 24th day of August 2026.

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Jamie Barber
Director
EERE Unit