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Docket # 55357
Document # 228184

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August 27, 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. 55357 / Georgia Power Company's 2023-2025 Affiliate Transactions Audit

Data Request from Commission Staff (STF-5)

Dear Mr. Haswell:

Enclosed herewith, please find Commission Staff Data Request **STF-5.** Georgia Power's initial responses to this Data Request package are requested as soon as possible, but not later than **September 28, 2026.**

If you have any questions concerning this transmittal, please call me at 404-656-4549.

Sincerely,

Rob Trokey
Director
Electric Unit

BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION

In the Matter of	**)**	
	)	**Docket No. 55357**
Georgia Power Company's	**)**	
2023-2025 Affiliate Transactions Audit	**)**	
	)	

STAFF'S FIFTH SET OF DATA REQUESTS 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 28, 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.

Affiliate Transaction – GridNet

STF-5-1 Please provide a copy of the contract/purchase agreement between Georgia Power Company and Alabama Power Company related to the GridNet.

STF-5-2 Does the purchase price of $2,705,393 represent 100% ownership by Georgia Power Company? If not, what ownership will Georgia Power and APC each have after the purchase?

STF-5-3 Explain how the GridNet equipment supports grid communications and operations.

STF-5-4 What operating expenses, other than depreciation and amortization, does Georgia Power Company expect to incur related to the GridNet equipment in the years 2026 through 2030?

STF-5-5 Please provide a copy of all analyses, studies, and other documents that were utilized for purposes of establishing or confirming the purchase price and the fair market value.

STF-5-6 What specific supporting documentation has been provided by APC, such as ledger, depreciation schedules, original cost, and accumulated depreciation to validate the net book value? Identify and provide copies of that documentation.

STF-5-7 Did Georgia Power independently verify APC's ledger values and depreciation schedules to confirm accuracy of the net book value? If so, identify and provide documentation of that review. If not, explain fully why not.

STF-5-8 Do APC and Georgia Power currently use the same smart grid communication platforms and systems? If not, please describe the differences and any known incompatibilities.

STF-5-9 Show in detail how the fair market value estimate was documented, and identify and provide the evidence relied upon to support the filing's assertion that fair market value is higher than net book value.

STF-5-10 Were cost comparisons performed against procuring new equivalent network equipment, as suggested in the filing's cost-avoidance justification? If not, explain fully why not. If so, identify and provide those comparisons.

STF-5-11 Has Georgia Power documented market pricing trends for GridNet routers, switches, and related hardware to validate that acquiring used assets is economically beneficial? If so, identify and provide the documentation and explain fully the process used.

STF-5-12 Is there any third-party or internal engineering assessment quantifying the remaining useful life and explaining why purchasing at net book value is preferable to acquiring new equipment? If so, please identify and provide that assessment.

STF-5-13 When was the equipment originally purchased by APC?

STF-5-14 How old is the equipment?

STF-5-15 Are there any warranties associated with the equipment? If so, identify and explain the remaining warranties that would transfer to Georgia Power related to the purchase.

STF-5-16 Where is the equipment currently located? Has it ever been used by APC to provide electric utility service? Is it currently being used by APC? For what purpose? Explain fully.

STF-5-17 Why does APC no longer need that equipment?

STF-5-18 Where will the equipment be located once it is purchased by Georgia Power?

STF-5-19 Has APC recorded any accumulated deferred income taxes (ADIT) related to the equipment that is being purchased by Georgia Power Company? If so, please explain fully and identify the ADIT amounts recorded by APC related to that equipment.

a. Will the ADIT amounts that have been recorded by APC related to such equipment be transferred to Georgia Power? If not, explain fully why not. If so, identify and explain the ADIT amounts that will be transferred to Georgia Power.

STF-5-20 How will the acquired equipment be treated for federal income tax purposes by Georgia Power? Please address each of these aspects: (1) the tax basis of the acquired equipment: what will that be and how is it determined, (2) tax depreciation: will MACRS or some other form of federal income tax deductions be applied? Explain fully.

BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION

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	)	

CERTIFICATE OF SERVICE

I hereby certify that the foregoing **Staff's Data Request STF-5** 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 27th day of August 2026.

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Rob Trokey
Director
Electric Unit