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Docket # 57243
Document # 228243

COMMISSIONERS:

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August 28, 2026

Newton Galloway
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406 North Hill Street
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Counsel for VoltaGrid, LLC

RE: Docket No. 57243 / VOLTAGRID, LLC

Data Request from Commission Staff (STF-PIA-1)

Dear Mr. Galloway:

Enclosed herewith, please find Commission Staff Data Request **STF-PIA-1.** VoltaGrid's initial responses to this Data Request package are requested as soon as possible, but not later than **September 14, 2026.**

If you have any questions concerning this transmittal, please contact Justin Pawluk at 404-463-8783.

Sincerely,

Justin Pawluk
Staff Attorney

BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION

SUSTAINABLE NEWTON, SARA and RANDALL VINSON and THEODOSIA and WILLIAM WADE and THEODOSIA AND WILLIAM WADE	)))	**Docket No. 57243**
v.	)	
VOLTAGRID, LLC	)	

STAFF'S DATA REQUEST STF-PIA-1

Newton Galloway
The Lewis Mills House
406 North Hill Street
Griffin, GA 30223
Counsel for VoltaGrid, LLC

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 VoltaGrid, LLC. 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 VolatGrid, LLC on or before **September 14, 2026.**

DEFINITIONS

As may be used in this document:

1. "The Company" or "VoltaGrid" or "The Utility" means VoltaGrid, LLC 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.

The "Hazelbrand Property" shall mean the property located at 10835 Hazelbrand Rd NE, Covington, Georgia.

STF-PIA-1-1 Produce all binding agreements between VoltaGrid and Serverfarm related to operations in Georgia (including at 10835 Hazelbrand Rd NE, Covington), and all non-binding instruments (LOIs, MOUs, term sheets) concerning the same.

STF-PIA-1-2 Provide a copy of all contracts and agreements between VoltaGrid and Georgia Power Company.

STF-PIA-1-3 Identify the entity responsible for operating each generator, including start-up, shut-down, dispatch, monitoring, compliance, and maintenance activities.

STF-PIA-1-4 State whether Serverfarm has any control, contractual authority, or influence over the operation of the generators, including load-following, outage management, reliability decisions, or environmental compliance.

STF-PIA-1-5 Provide a copy of all filings, applications, emails, letters, or communications submitted to the Georgia Environmental Protection Division (EPD)

STF-PIA-1-6 Describe the pricing structure, including subscription fees, volumetric charges, standby charges, or any other compensation for electric supply.

STF-PIA-1-7 Does VoltaGrid provide services to any other customers in Georgia, including providing islanded electric service? If so, please identify the location.

STF-PIA-1-8 Provide corporate ownership structure charts for both VoltaGrid and, if known, for Serverfarm.

STF-PIA-1-9 Provide documents showing how VoltaGrid finances the generation project, including any agreements based on revenue from selling power.

STF-PIA-1-10 Provide all communications with the City of Covington regarding electric service arrangements for Serverfarm.

STF-PIA-1-11 Provide all documents in VoltaGrid's possession that reflect statements by Georgia Power concerning electricity provided to or on the Hazelbrand Property.This includes, but it is not limited to, statements by Georgia Power concerning its service to Serverfarm and/or VoltaGrid and statements by Georgia Power concerning VoltaGrid's plan to produce and/or sell power.

STF-PIA-1-12 Identify any discussions regarding "temporary power" arrangements until Georgia Power upgrades its infrastructure.

STF-PIA-1-13 Provide a timeline of project development, including when and how Serverfarm approached VoltaGrid.

STF-PIA-1-14 Provide diagrams and/or maps of the site, as well as the site description, including the relevant electric generation components.

STF-PIA-1-15 Please provide any information on the plans to ramp up for the power on site.

STF-PIA-1-16 Who operates and dispatches the plant, bears fuel and outage risk, and receives payment? Is compensation fixed, capacity-based, energy-based, availability-based, or tied to the data center's kWh use?

STF-PIA-1-17 In Response to STF-PIA-44-4 (Dkt. 44280), Georgia Power stated that "upon learning of the arrangement" between Serverfarm and VoltaGrid, that Georgia Power "notified both parties that the arrangement appeared to violate the Territorial Act and infringe upon Georgia Power's exclusive right to serve the Premises."Produce any Documents that reflect or are concerning the notice referred to by Georgia Power.

STF-PIA-1-18 Please describe in detail any basis for VoltaGrid's dispute, if any, of the assertion that VoltaGrid is an "electric power company"

STF-PIA-1-19 In VoltaGrid's May 20, 2026, letter to Georgia's Environmental Protection Division, it asserted that its "VoltaGrid ATL-1 facility may provide capacity for other similarly qualified large load facilities."

a. Describe sales, marketing, or outreach efforts concerning the future uses of the VoltaGrid facility on the Hazelbrand Property, and produce documents reflecting the same.

b. Describe, in detail, steps VoltaGrid has taken to expand its business in Georgia, including to identify potential customers or to advertise its services in Georgia, and produce documents reflecting the same.

c. Identify all potential customers in Georgia with whom VoltaGrid has discussed its services, regardless of how formal or specific those discussions may or may not have been and identify who at VoltaGrid has the most knowledge of these conversations.

STF-PIA-1-20 Does VoltaGrid agree that its facility on the Hazelbrand Property produces electric energy, steam, or other forms of useful energy which are used for industrial, commercial, heating, or cooling purposes? If not, please describe in detail why not.

STF-PIA-1-21 Describe in detail why VoltaGrid denies that it "plans to furnish electric power to Serverfarm," as alleged in Petitioners' paragraph 25.

STF-PIA-1-22 Identify the source(s) of electric power, if any, used to supply power to VoltaGrid's operations on the Covington site, and describe which aspects of VoltaGrid's operations use that electric power.

STF-PIA-1-23 Describe in detail the basis for denying the Petition's allegation, in paragraph ten, that "VoltaGrid will not be owned or operated by its customer, Serverfarm."

a. If Serverfarm will own some or all of the VoltaGrid Hazelbrand Facility, describe in detail which parts of the VoltaGrid Hazelbrand Facility will be owned by Serverfarm and produce documents supporting the same.

b. If Serverfarm will operate some or all of the VoltaGrid Hazelbrand Facility, describe in detail which parts of the VoltaGrid Hazelbrand Facility will be operated by Serverfarm, and produce documents supporting the same.

BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION

In the Matter of	**)**	
	)	
SUSTAINABLE NEWTON, SARA and RANDALL	**)**	
VINSON, and THEODOSIA and WILLIAM WADE	**)**	**Docket No. 57243**
v.	**)**	
VOLTAGRID, LLC	**)**	

CERTIFICATE OF SERVICE

I hereby certify that the foregoing **Staff's Data Request STF-PIA-1** 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 28th day of August 2026.



Justin Pawluk
Staff Attorney