FILED
09/04/2026
Executive Secretary G.P.S.C.

Docket # 57171
Document # 228313

COMMISSIONERS:

JASON SHAW, Chairman
LAUREN "BUBBA" McDONALD, Vice-Chairman
PETER HUBBARD
DR. ALICIA M. JOHNSON
TRICIA PRIDEMORE

REECE McALISTER
EXECUTIVE DIRECTOR

SALLIE TANNER
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

September 4, 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-5)

Dear Mr. Haswell:

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

If you have any questions concerning this transmittal, please contact Rob Trokey at 404-656-4549.

Sincerely,

Rob Trokey
Director
Electric Unit

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-5 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 **October 5, 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-5-1 Refer to the Direct Testimony of Dr. Ross Beppler, Lee Evans, and Brandon Looney ("Panel Testimony"), p. 9, lines 11-14 and Georgia Power's response to STF-JKA-10-11 Attachment A in Docket No. 56765.

a. Please identify which Commission order or orders in the 2010, 1994, and 1992 rate cases referenced on p. 10, lines 11-21 approved the Company's current method for determining the value of capacity used for the reliability component of the real time pricing ("RTP") rate.

b. Please identify all relevant testimony and discovery responses that describe the Commission-approved method for determining the value of capacity used for the reliability component of the RTP rate as referenced in your response to part (a).

c. Please explain how the decisions described in the value of capacity used for the reliability component of the real time pricing ("RTP") rate for the years 2023 through 2025 are consistent with the material identified in response to parts (a) and (b). In your response, please describe the specific limitations on the Company's exercise of discretion in determining the value of capacity for purposes of RTP rates.

d. Please provide all internal documentation of the decisions to change the basis for the capacity values, and any documentation of alternatives to the changes made.

e. Please identify which customers, or customer representatives, if any, knew about the change in method for determining capacity value.

f. The Company defines the "peaker theorem," on p. 7, lines 7-10 and in STF-JKA-1-7, Docket No. 56765. Please explain how the methods used for the years 2023 through 2025 are consistent with the peaker theorem.

g. Please identify any other regulatory filings in which the Company files a value of capacity that represents the marginal capital cost of peaking generation, and provide the calculated value for the years 2023 through 2025 as filed. If there are any discrepancies between those values and the values used in the RTP rate, please explain.

h. Documentation of decision in 2022. Did any customers or groups of customers know the Company changed the method for determining the value of capacity used for the reliability component of the RTP rate? if so, which customers and how did they know?

STF-JKA-5-2 Please refer to Georgia Power response to STF-PIA-2-9 and STF-JKA-2-28 in Docket No. 56765.

a. Has the Company, in the past decade, had the to remarket firm transportation ("FT")? If so:
   i. Please explain how and why the FT capacity was re-marketed, including the specific operating conditions under which a re-marketing decision was made, how the re-marketed capacity was priced, and what the results of the re-marketing activity were from 2023-2025. Please provide supporting data in an excel spreadsheet.
b. How are FT re-marketing revenues recorded for cost allocation purposes (e.g., as an offset to FT fixed costs)?
c. Please identify how Georgia Power's proposed allocation of new FT would work if there is a net cost remaining for the next FCR period, due to any failure to remarket all new FT costs. Would those remaining costs be recovered from FCR customers only, under a Part B under-recovery mechanism?

STF-JKA-5-3 With respect to the Panel Testimony, p. 16, lines 2-11, please provide a working copy of the most recent Class Cost of Service Study model. The model should be sufficiently detailed to understand the following:

a. Allocation of capital, fixed, variable and fuel costs to the revenue requirement for customer classes eligible for RTP rates, at a level of detail sufficient to determine, for example, the firm transportation (FT) embedded cost allocation to those customer classes;
b. Billing determinants used for customer classes eligible for RTP rates; and
c. Revenue forecast for customer classes eligible for RTP rates, including the specific revenue forecasts for RTP rates.

STF-JKA-5-4 With respect to the Panel Testimony, p. 16, lines 2-11, please explain how the Company's COSS demonstrates that the RTP rate is revenue neutral with respect to rates designed directly from class-allocated embedded costs.

STF-JKA-5-5 With respect to the Panel Testimony, p. 17, lines 6-10:

a. Please explain why it is reasonable to allocate FT costs using a different class allocation factor than the Company uses for transmission costs.

STF-JKA-5-6 Please identify all Georgia Power costs in the most recent Class Cost of Service Study that are, or have been, allocated on a 1-CP basis.

STF-JKA-5-7 Refer to Georgia Power's Response to STF-JKA-2-4(f) in Docket No. 57171, [1-CP]

a. Please provide the costs in each category by month covering historic period FCR-26, FCR_27, and projected period FCR-27. Identify which categories have increased in cost between FCR-26 and FCR-27, and by how much.

b. Please describe how procurement decisions are made for each of the cost categories. For example, when and how are decisions made to procure rail car leases or incremental FT? Does the Company rely on projected load and projected unit dispatch when determining coal take minimums?

c. For each procurement decision, identify what load forecast was or would be the basis at the time of decision.

i. Provide each such existing load forecast in spreadsheet format, separating our components of load growth split by customer class, and further split by RTP, organic data center, and large load demand.

ii. To the extent not provided in the answer to the prior question, provide all load forecasts filed with the Commission beginning with the 2022 IRP, with the same components broken out as in the above question.

STF-JKA-5-8 Refer to pages 63-65 of the September 1, 2026 hearing transcript.

a. Please provide the Company's analysis estimating the amount of forecasted new FT that would be assigned to the new large load customers versus the existing RTP customers.

b. Please provide the "… aggregate forecast of what allocation would be moved to large load customers (p. 65) and the file or analysis showing the "total company look of what the large load costs in total incurred are." (as referenced by Mr. Evans).

c. Identify if any allocators for the large load costs have changed and, if so, identify which costs, when the allocator was changed, and why.

STF-JKA-5-9 Refer to Georgia Power's Response to STF-DEA-3-4 in Docket No. 55378, please provide monthly historical average electricity prices by customer class from 1990 through YTD 2026 in spreadsheet format.

STF-JKA-5-10 Refer to Georgia Power's response to STF-PIA-2-8(b) in Docket No. 56765.

a. Identify the specific causes of all "anticipated power flow and thermal constraints" during the FCR-27 period.
b. Please provide all referenced studies of "generation and transmission outages" produced between 2023 to 2026 YTD.

STF-JKA-5-11 Refer to Georgia Power's response to STF-JKA-2-15(a) in Docket No. 56765 stating that "when the Company dispatches resources based on must-run coal constraints, those resources are typically restricted from setting marginal price in the Aurora model." When would must-run coal constraints set marginal price in the Aurora model?

STF-JKA-5-12 Refer to Georgia Power's response to STF-JKA-5-7(f) in Docket No. 56765. Please define "marginal running cost of the system" for purposes of whether long-term PPAs may set system lambda.

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-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:

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

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

Brandon F. Marzo
Steven J. Hewitson
Allison W. Pryor
Troutman Pepper Hamilton Sanders LLP
600 Peachtree Street NE, Suite 3000
Atlanta, GA 30308-2216
brandon.marzo@troutmansanders.com
Steven.hewitson@troutman.com
allison.pryor@troutman.com

Justin Pawluk, Staff Attorney
Georgia Public Service Commission
244 Washington Street, SW
Atlanta, GA 30334
jpawluk@psc.ga.gov

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

Charles B. Jones, III
Jim Kelleher
Georgia Association of Manufacturers
75 Fifth Street NW
Suite 3412
Atlanta, Georgia 30308
cjones@gamfg.org
jkelleher@gamfg.org

Jeffry C. Pollock
J. Pollock Incorporated
14323 South Outer 40 Road,
Suite 206N
Town and Country,
Missouri 63017-5734
jcp@jpollockinc.com

Bob Sherrier
Amitav Kamani
Jennifer Whitfield
Alyssa Krantz
Southern Environmental Law Center
Ten 10th Street NW, Suite 1050 8
Atlanta, Georgia 30309
bsherrier@selc.org
akamani@selc.org
jwhitfield@selc.org
akrantz@selc.org

Jim Clarkson
Resource Supply Management
135 Emerald Lake Rd
Columbia, SC 29209
jclarkson@rsmenergy.com

So certified, this 4th day of September 2026.

_____

Rob Trokey
Director
Electric Unit