FILED
09/16/2026
Executive Secretary G.P.S.C.

Docket # 56003
Document # 228447

COMMISSIONERS:

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

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 16, 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. 56002 / Georgia Power Company's 2025 Integrated Resource Plan

Docket No. 56003 / Georgia Power Company's Application for the Certification, Decertification, and Amended Demand-Side Management Plan

Data Request from Commission Staff (STF-PIA-22)

Dear Mr. Haswell:

Enclosed herewith, please find Commission Staff Data Request **STF-PIA-22** Georgia Power's initial responses to this Data Request package are requested as soon as possible, but not later than **October 16, 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

In the Matter of	**)**	
	)	**Docket No. 56002**
Georgia Power Company's	**)**	
2025 Integrated Resource Plan	**)**	
	)	
Georgia Power Company's	**)**	**Docket No. 56003**
Application for the Certification, Decertification,	**)**	
and Amended Demand-Side Management Plan	**)**	

STAFF'S TWENTY-SECOND 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 **October 15, 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.

Wildfire Mitigation Strategy Questions

Determination of Wildfire Risk Areas and Strategies:

STF-PIA-22-1 How does the Company continue to 'evaluate opportunities to mitigate identified extreme weather risk' as stated in the 2022 IRP DR response to ST-PIA-3-24?

STF-PIA-22-2 How does the Company currently determine whether wildfires are identified as an 'extreme weather risk' in its service territory?

STF-PIA-22-3 Is this determination based on Company studies or determined by other resources? Please explain the history of Company determination.

STF-PIA-22-4 Specific strategies, tools or resources commonly utilized.

a. What is the Company official Wildfire Mitigation strategy to limit damage to facilities and reduce customer impact? Provide a copy of this strategy.
b. Please explain how wildfires affect Company planning with respect to:
    i. Risk methodology
    ii. Risk assessment and analysis
    iii. Risk scenarios
    iv. Risk plan coordinated with others (utilities, federal/state/local governments, etc.)
    v. Grid hardening is influenced or specifically targeted to wildfire mitigation
    vi. Other
c. Does the Company periodically inspect transmission and distribution facilities in identified wildfire risk areas? Please expand your response for the work progress company does in the following specific areas:
    i. Environmental Modeling/ Weather Forecasting or Modeling
    ii. Grid design, Grid Monitoring, and Asset hardening (systems, technologies, etc.)
    iii. Vegetation Management (VM) Integration.
    iv. Other if any.
d. How does the Company integrate their Wildfire Mitigation strategy with the VM program, or is it a separate strategy / program?
e. Is there a separate budget for Wildfire Mitigation?

f. How long has the Wildfire Mitigation strategy been in existence and how has it changed over time?
g. Provide Wildfire Mitigation strategy element details (real-time monitors, remote sensing, forecasts, predictive analysis, software, etc.) and how they are used. Can or has any strategy, which was previously in use, also be used in the wildfire strategy?
h. How were existing VM strategies used, or integrated with the Wildfire Monitoring strategy elements? Are current VM programs sufficient?
i. Provide plans for improvements to the Wildfire Mitigation strategy.

Operational Plans and Actions:

STF-PIA-22-5 How do wildfires affect Company Operation Plans and Actions?
a. Assessment Tools
b. Monitoring Tools
c. Storm Center Mobilization
d. VM contractors
e. Partnerships with others (utilities, federal/state/local governments, etc.)
f. Other

STF-PIA-22-6 Does the Company currently utilize any advanced technologies (e.g. automated fault detection devices or programs) for reducing the likelihood of wildfire ignition from transmission and distribution facilities? Are there plans to add these technologies?

STF-PIA-22-7 Please provide details on Company plans for improvements to the Wildfire Mitigation strategy Operations Plans and Actions.

Reporting:

STF-PIA-22-8 Has the Company or an outside entity ever conducted root cause, after-action or lessons-learned analysis and prepared reports related to wildfires in its territory? If so, please provide a copy of the three most recent reports.

STF-PIA-22-9 Please provide data on past wildfire events which triggered action by the Company, if any, from January 2022 to the present date.

a. Date of event
b. Facility and equipment damaged
c. Length of event
d. Location / area / counties
e. Customers affected
f. Original cause (weather, human, utility, vegetation in ROW, vegetation out of ROW, vehicle, etc.)
g. Company response
h. Event response cost
i. Post event assessment

Public Awareness:

STF-PIA-22-10 Does the company have any public awareness programs regarding wildfire-related risks? How does the Company engage with other Community based organizations? Please explain if any.

Insurance Plan:

STF-PIA-22-11 How does the Company recover a personal injury or property damage caused by wildfire? Please explain the insurance plans, if any, and explain how it best works for the ratepayers.

BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION

In the Matter of	)	
	)	**Docket No. 56002**
Georgia Power Company's	)	
2025 Integrated Resource Plan	)	
	)	
Georgia Power Company's	)	**Docket No. 56003**
Application for the Certification, Decertification,	)	
and Amended Demand-Side Management Plan	)	
	)	

CERTIFICATE OF SERVICE

I hereby certify that the foregoing **Staff's Data Request STF-PIA-22** 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
Troutman Pepper Hamilton Sanders LLP
600 Peachtree Street NE, Suite 3000
Atlanta, GA 30308-2216
steven.hewitson@troutmansanders.com

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

Robert B. Baker
Robert B. Baker, P.C.
2480 Briarcliff Road, NE
Suite 6
bobby@robertbaker.com

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

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

Charles B. Jones, III
Lloyd Avram
Georgia Association of Manufacturers
The Hurt Building
50 Hurt Plaza, Suite 1620
Atlanta, Georgia 30303
cjones@gamfg.org
lavram@gamfg.org

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

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

Whit Cox
Southern Renewable Energy Association
11610 Pleasant Ridge Rd., Suite 103 #176
Little Rock, AR 72223
whit@southernrenewable.org

Simon Mahan
Southern Renewable Energy Association
11610 Pleasant Ridge Rd., Suite 103 #176
Little Rock, AR 72223
simon@southernwind.org

Scott F. Dunbar
Keyes & Fox LLP
1580 Lincoln Street, Suite 1105
Denver, CO 80203
sdunbar@keyesfox.com

Zachary Fabish
50 F Street NW, 8th Floor
Washington, DC 2001
zachary.fabish@sierraclub.org

Kimberly (Kasey) A. Sturm Weissmsn PC
One Alliance Center, Fourth Floor
3500 Lenox Road
Atlanta, GA 30326
kaseys@weissman.Law

Liz Coyle
Georgia Watch
55 Marietta Street, NW
Suite 903
Atlanta, GA 30303
lcoyle@georgiawatch.org

Newton M. Galloway
Terri M. Lyndall
Galloway & Lyndall, LLP
406 North Hill Street
Griffin, GA 30223
ngalloway@gallyn-law.com
tlyndall@gallyn-law.com

Allison Kvien
Regulatory Director Southeast
2810 Coliseum Centre Drive Suite 120,
Charlotte, NC 28217
akvien@votesolar.org

David Nifong
City of Decatur, Department of Public Works
2635 Talley Street
Decatur, GA 30030
david.nifong@decaturga.com

Gordon Kenna
DeKalb County, Public Works
180 Sams Street
Decatur, GA 30030
hgkenna@dekalbcountyga.gov

Anna Bella Korbatov
Director of Regulatory Affairs
Fermata Energy
100 10th Street NE, #101
Charlottesville, VA 22902
annabella@fermataenergy.com

Curt Thompson
Attorney at Law
Thompson & Associates Law Firm, PC
3775 Venture Drive, D100
Duluth, GA 30096
curtbthompson@bellsouth.net

Jonathan Hunt
Metropolitan Atlanta Rapid Transit Authority
2424 Piedmont Road, NE
Atlanta, GA 30324
jhunt@itsmarta.com

Peter Hubbard
Georgia Center for Energy Solutions
55 Leslie Street, SE
Atlanta, GA 30317
peter@georgia-ces.org

David E. Penland
One Griffin Center
100 S. Hill Street, Suite 600
Griffin, GA 30223
dpenland@beckowen.com

Benjamin L. Snowden
Cordon M. Smart
Fox Rothschild LLP
301 Hillsborough Street, Suite 1120
Raleigh, NC 27601
BSnowden@FoxRothschild.com
CSmart@FoxRothschild.com

Joey Crews
Athens-Clarke County,
Sustainability Office
110 Bray Street
Athens, GA 30601
joseph.crews@accgov.com

Mendie White
Gwinnett County, Offices of the County Administrator
75 Langley Dr.
Lawrenceville, GA 30046
mendie.white@gwinnettcounty.com

Steve Letendre, PhD
Senior Director of Regulatory Affairs
Fermata Energy
100 10th Street NE. #101
Charlottesville, VA 22902
steve@fermataenergy.com

Alicia Brown
Capital Good Fund
aliciab@capitalgoodfund.org

Juan Estrada, Esq.
Attorney At Law
Juan Estrada Law, LLC
3675 Crestwood Parkway, Suite 400
Duluth, GA 30096
Juan@JuanEstradaLaw.com

John Joseph McNutt
Regulatory Law Counsel
U.S. Army Legal Services Agency
Office of The
Judge Advocate General
9275 Gunston Road (JALS-ELD)
Fort Belvoir, VA 22060-5546
John.j.mcnutt.civ@army.mil

Juan Estrada
Attorney At Law
Juan Estrada Law, LLC.
3675 Crestwood Parkway, Suite 400,
Duluth, Georgia 30096
Juan@JuanEstradaLaw.com
Chandra Farley
John R. Seydel
City of Atlanta, Office of Sustainability & Resilience
55 Trinity Ave SW
Atlanta, GA 30303
cfarley@atlantaga.gov
jrseydel@atlantaga.gov

Mike Wharton
Athens-Clarke County Unified Government
Sustainability Office
110 Bray Street
Athens, GA 30601
Mike.Wharton@accgov.com

Donald Moreland
Georgia Solar Energy Association
1199 Euclid Avenue
Atlanta, GA 30307
don@solarcrowdsource.com

So certified, this 16th day of September 2026.

_____

Rob Trokey
Director
Electric Unit