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October 1, 2026

Ms. Sallie Tanner
Executive Secretary
Georgia Public Service Commission
244 Washington St., SW
Atlanta, Georgia 30334
stanner@psc.ga.gov

RE: Sustainable Newton, Sara and Randall ("Randy") Vinson, and Theodosia and William ("Billy") Wade, Petitioners v. VoltaGrid, LLC, Respondent; Docket No. 57243

Dear Ms. Tanner:

This letter is to inform the Georgia Public Service Commission and all Parties of Record in the above-referenced proceeding of Sustainable Newton, Sara and Randall ("Randy") Vinson, and Theodosia and William ("Billy") Wade's (collectively, "Petitioners") proposed factual stipulations and the identity of witnesses expected at a hearing for Petitioners' direct case.

Petitioners' proposed factual stipulations

Petitioners shared the below list of proposed factual stipulations with VoltaGrid's counsel in the evening of September 29. Today, at 3:00, VoltaGrid proposed a call for anytime after 3:20 p.m. On that call, **VoltaGrid indicated that it agreed to stipulations #10, #11, #12, #17, and #18, and it objected to the remaining stipulations**. To ensure a timely response to the Hearing Officer's Notice of Hearing and Scheduling Order, Petitioners are filing their proposed stipulations below. The parties will separately jointly file agreed upon stipulations with the Commission as soon as practicable.

In addition, as will be addressed in a separate motion to the Hearing Officer, VoltaGrid refuses to provide Petitioners access to substantial documents, which it has withheld based on "trade secret" claims, despite failing to provide an affidavit or basis for those claims.

Petitioners anticipate further stipulations could lead to a more efficient resolution of this matter before the Commission, but without access to a substantial number of documents filed in this matter, Petitioners are unable to propose those stipulations at this time.

VoltaGrid

1. VoltaGrid is an electric power company.

2. VoltaGrid is "America's largest portable utility, power company." (Oilfield 360 Podcast, "#83. Building a Billion-Dollar Energy Company: Nathan Ough's Story," at 17:29, uploaded Jan. 20, 2026 at https://www.youtube.com/watch?v=Q3jNRNEqBTU.)

3. In the six years since its founding, VoltaGrid has grown to approximately 1500 employees and it is still growing fast. VoltaGrid is on track to have approximately 2,000 employees by the end of the year. (*Id.* at 12:40, 15:20.)

4. VoltaGrid is spending about a quarter of billion dollars every thirty days on capital. (*Id.* at 18:25.)

VoltaGrid's Operations at 10835 Hazelbrand Rd NE ("VoltaGrid-Covington")

5. VoltaGrid-Covington plans to produce electricity on behalf of its customer, in quantities determined by the customer, to be dispatched as needed by the customer. (STF-PIA-1-18.)[1]

6. VoltaGrid-Covington produces electric energy for industrial, commercial, heating or cooling purposes. (STF-PIA-1-20.)

[1] Citations to data request responses refer to Voltagrid, LLC's responses in Docket 57243.

7. VoltaGrid-Covington is not a distributed generation facility, under the definition provided in the Cogeneration Act. (O.C.G.A. § 46-3-52(4).)

8. VoltaGrid-Covington is not selling any energy directly to Georgia Power.

9. VoltaGrid-Covington obtains electric service from Georgia Power. (STF-PIA-1-22.)

10. VoltaGrid-Covington and Serverfarm are separate legal entities. (STF-PIA-1-23.)

Serverfarm

11. Serverfarm has no ownership interest in VoltaGrid. (STF-PIA-1-23.)

12. Serverfarm owns the land at 10835 Hazelbrand Rd NE, which is subject to a lease to VoltaGrid. (STF-PIA-1-23.)

13. Serverfarm's obligations with respect to VoltaGrid's operations at 10835 Hazelbrand Rd NE, are limited to those set forth in the Agreement for Power Generation. (STF-PIA-1-23.)

14. Serverfarm is not an electric power or light company, and Serverfarm is not a utility provider.

Georgia Power

15. Georgia Power is selling electric power to Serverfarm.

16. Georgia Power is selling electric power to VoltaGrid. (STF-PIA-1-22.)

17. Georgia Power is the designated primary electricity supplier for 10835 Hazelbrand Rd NE, Covington, under the Georgia Territorial Act.

18. On June 16, 2026, Georgia Power sent, and VoltaGrid received, a letter concerning VoltaGrid's plan to provide bridge power to Serverfarm. A true and correct copy of this letter is available at VG003301-VG003302.

EPD Communications

19. On November 12, 2025, VoltaGrid submitted an Application to EPD for an air permit. A true and correct copy of that Application is attached to the Petition as Exhibit 2.

20. On February 11, 2026, EPD shared with VoltaGrid and the public a draft air permit for VoltaGrid and an accompanying narrative statement. A true and correct copy of the draft air permit and narrative is available at VG000361-VG000387.

21. On May 20, 2026, VoltaGrid sent EPD a letter concerning its air permit application. A true and correct copy of VoltaGrid's letter to EPD and related transmittals is available at VG001224-VG001231.

22. On July 12, 2026, EPD issued a "Notice of Violation" to VoltaGrid. A true and correct copy of that notice is attached to the Petition as Exhibit 1.

23. On September 18, 2026, EPD issued a final air permit to VoltaGrid, and an accompanying narrative statement. A true and correct copy of that permit and statement are attached hereto as Exhibit Stip-1.

Petitioners' witness list

At this time, Petitioners anticipate calling the following witnesses as part of their direct case. As indicated by an asterisk below, most of these witnesses are not affiliated with Petitioners, and Petitioners anticipate that testimony will need to be elicited through subpoenaed presence and cross-examination, rather than pre-filed direct testimony. Petitioners will request the Hearing Officer's formal approval of this process in a separately filed motion.

Maurice Carter	Petitioner and co-founder and President of Sustainable Newton
Sara Vinson	Petitioner
Randy Vinson	Petitioner
Theodosia Wade	Petitioner
Billy Wade	Petitioner

Nathan Ough	VoltaGrid President & CEO*
Korby Bracken	VoltaGrid*
David Bell	VoltaGrid, Vice-President- Data Center and Microgrid Development*
Jenny Twentyman	VoltaGrid, Project Manager*
Sam Johnson	Southern Company Services, Generation Planning & Development*
Jason Volk	Serverfarm, VP-Acquisitions & Asset Management*
Kyong Kim	Georgia Power Regulatory Accounting Director*
Mike Jewell	City of Covington Natural Gas Director*
Audra Gutierrez	City of Covington Document Custodian
Tammy Fwindell	Manager of the VOC/Combustion Unit in the Stationary Compliance Unit, Document Custodian

Please call me at (678) 277-4821 if you have any questions regarding this filing.

Sincerely,

___/s/Jennifer Whitfield_____

Jennifer Whitfield

cc: Mr. Chris Collado, Hearing Officer
Parties of Record
Counsel for Proposed Intervenors