**STATE OF GEORGIA**

**BEFORE THE**

**GEORGIA PUBLIC SERVICE COMMISSION**

**In Re:**

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| **Georgia Power Company's** | ) | |
| **RTP Revenue Credit** | ) | **Docket No. 57171** |
| **And Allocation Methodology** | ) | |

## MOTION TO STRIKE PORTIONS OF TESTIMONY

COMES NOW Georgia Power Company ("Georgia Power" or the "Company") and moves to strike portions of the Direct Testimony of John D. Wilson on behalf of Georgia Interfaith Power and Light ("GIPL"), and its member congregations Park Avenue Baptist Church, Temple Sinai, and Unitarian Universalist Church of Savannah (the "GIPL Testimony"). The portions of the GIPL Testimony at issue in this Motion to Strike are irrelevant, clearly outside the scope of this proceeding, and would not assist the Georgia Public Service Commission (the "Commission") in rendering a decision on this matter. Accordingly, the portions of the GIPL Testimony identified in this Motion to Strike should be excluded from the record in this proceeding and not considered by this Commission.

## BACKGROUND

On May 28, 2026, the Commission issued its Short Order Adopting Stipulation in Docket No. 56765 requiring that the "Commission shall further review the methodology by which the Company credits Real-Time Pricing ("RTP") revenue to the FCR revenues and the allocations the Company is making under such methodology in this Docket. This proceeding shall be concluded by December 31, 2026, and the Commission may make modifications if appropriate. The implementation of such modifications, if any, shall be credited to fuel revenues as determined by

the Commission, and any corresponding change to base revenues shall be recorded in a regulatory asset or liability and addressed in the next base rate case." This language was reiterated verbatim in the Procedural and Scheduling Order ("PSO") issued in Docket No. 57171 on July 7, 2026.[1]

On August 14, 2026, Georgia Power filed the Direct Testimony of the Panel of Dr. Ross Beppler, Lee Evans, and Brandon Looney. A direct hearing was held on the pre-filed testimony on September 1, 2026. The GIPL Testimony that is the subject of this Motion to Strike was filed on September 23, 2026. Specifically, the Company moves to strike the following testimony filed by Witness Wilson:

- Page 2, Line 16 through the word "Second," on Page 3, Line 14.[2]

  This testimony offers recommendations regarding the reliability and transmission cost components of the RTP rate.

- Page 4, Line 18 through Page 5, Line 2.

  This testimony recommends changes to the RTP rate design.

- Page 12, Line 13 through Page 17, Line 14.

  This testimony addresses Georgia Power's method for calculating the value of capacity for the reliability component of the RTP rate, RTP pricing, and includes commentary on RTP rate design.

- Page 17, Line 17 beginning at "Nonetheless," through Page 19, Line 17.

  This testimony makes recommendations related to the RTP rate and rate design unrelated to the fuel credit methodology.

- Page 27, Lines 9-16.

  This testimony proposes recommendations for the next base rate case unrelated to Georgia Power's fuel credit methodology.

[1] *Procedural and Scheduling Order*, Georgia Public Service Commission, Docket No. 57171 (July 7, 2026).
[2] The full text of the referenced testimony can be found in Trade Secret Attachment A to this Motion.

- Page 30, Line 14, beginning at "However," through Page 31, Line 11.

  This testimony addresses the recovery factor, which is an RTP rate component and not related to the fuel credit methodology, and recommended changes to the same in the next rate case.

- Page 33, Line 3 through Page 34, Line 2.

  This Q&A discusses hedging costs, which is not within the scope of this proceeding, and was fully litigated in FCR-27 in Docket No. 56765.

Georgia Power's Motion to Stike is timely and filed in accordance with Section 3(g) of the PSO.

ARGUMENT

## I. The Portions of the GIPL Testimony Identified in this Motion to Strike are Outside the Scope of this Hearing and Irrelevant to the Decision Before the Commission.

It is clear from both the PSO in this docket and Final Order in Docket No. 56765 that the scope of the current investigation is limited to the Company's RTP Fuel Credit Methodology by which the Company assigns revenue received from RTP customers to either fuel or base rates. This proceeding is limited to the accounting treatment of where revenues should be booked and not an investigation into the structure of the RTP rate itself. As a result, testimony regarding proposed changes to the structure of the RTP rate and how the price is set, including the calculation of the five RTP components, is beyond the scope of this limited proceeding and should be stricken from the record of this case.

The scope of this proceeding was established in the Commission's August 4, 2026 Order Adopting Stipulation resolving all issues in the FCR-27 proceeding. Rather than address the issues the Commission clearly identified for this proceeding in the PSO, the GIPL Testimony introduces new issues and proposes changes to the RTP rate itself. The GIPL Testimony also revisits issues appropriately raised, considered, and decided in the FCR-27 case in Docket No. 56765. In that regard, much of the GIPL Testimony is beyond the limited scope of this proceeding.

Witness Wilson himself identifies that roughly the first half of his testimony, including recommending changes to the transmission and reliability components of the RTP rate, is outside the scope of this proceeding. (*See* GIPL Testimony at 17.) The GIPL Testimony includes a dedicated question and answer that explicitly states that changes to RTP rate are not within the scope of this proceeding. (GIPL Testimony at 30.) Such acknowledgement by GIPL only serves to emphasize GIPL's attempts to leverage the current proceeding to propose changes to the RTP rate that are appropriately addressed in a rate case. The Commission should take Witness Wilson at his word and strike the GIPL Testimony readily acknowledged to be outside the scope of this proceeding.

As another example, Witness Wilson's testimony regarding load growth and fuel hedging is wholly unrelated to whether RTP revenue is assigned to fuel or base rates. Indeed, the GIPL Testimony acknowledges that Witness Wilson's testimony is "revisiting this issue" and "may be outside the scope of this proceeding." (GIPL Testimony at 33.) There is no "may be" about it. The PSO was clear regarding the issues before the Commission and this portion of the GIPL Testimony is outside the scope of this proceeding and should be stricken.

Finally, not only are Witness Wilson's first set of recommendations topically unrelated to the scope of this proceeding, but they also seek Commission action that exceeds the authority of what the stipulating parties agreed to in resolution of the FCR-27 case. The only Commission action contemplated when the stipulating parties agreed to establish this proceeding was the potential modification of the "methodology by which the Company credits Real-Time Pricing ("RTP") revenue to the FCR revenues and the allocations the Company is making under such methodology." (PSO at 1.) To expand the scope of Commission action at this point would undermine the settlement of FCR-27. Further, it would be inappropriate for the Commission to

review how the Company calculates, modifies, and sets the RTP rate in the absence of the comprehensive review of the Company's total revenue requirements conducted in a formal base rate case. Even the requested Commission action sought by Witness Wilson's first set of recommendations is beyond the scope of the proceeding. As with the substantive arguments identified above, the recommendations offered also exceed the limited scope of this proceeding.

It is reasonable and appropriate for the Commission to strike the portions of the GIPL Testimony identified above. Mr. Wilson, by his own admission, submitted testimony that is beyond the scope of the issues identified for this proceeding and wholly unrelated to how RTP revenue should be recorded as between fuel and base rates. The Commission should strike such testimony to ensure consistency with its PSO and to maintain efficiency of this proceeding.

## CONCLUSION

The portions of the GIPL Testimony identified in this Motion to Strike are irrelevant, outside the scope of this proceeding as established by the PSO, and are not properly raised before this Commission in this Docket. For all the foregoing reasons, Georgia Power respectfully requests that the Commission strike the portions of the GIPL Testimony identified in this Motion to Strike.

Respectfully submitted, this 8th day of October 2026.



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