BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION
STATE OF GEORGIA

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

Exhibit AG-5

From: Audra Gutierrez <agutierrez@cityofcovington.org>
Sent: Friday, 17 July 2026 16:19:37
To: William Snow <wsnow@selc.org>
Subject: RE: Open Records Request: VoltaGrid

Good afternoon Mr. Snow:

Please see the link below regarding the missing records.

Wm Snow 2

Thanks,

Audra M. Gutierrez, GMCA-MMC, IIMC-CMC
City of Covington | City Clerk
☎770-385-2010 | agutierrez@cityofcovington.org

COVINGTON
georgia
Covington City Hall
2194 Emory Street N.W. | Covington, GA 30014
P.O. Box 1527 | Covington, GA 30015
☎ (770) 385 - 2000

From: William Snow <wsnow@selc.org>
Sent: Tuesday, July 7, 2026 3:31 PM
To: Audra Gutierrez <agutierrez@cityofcovington.org>
Subject: RE: Open Records Request: VoltaGrid

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Dear Ms. Gutierrez,

I hope you enjoyed a great holiday weekend! Thank you once again for sharing this production. We have had the chance to review it and believe it is incomplete, with many documents missing that are either mentioned in emails or listed as attachments to emails but not produced along with them. For your convenience, I've included that list below. Could you please produce them as well?

- Document titled “Maintenance Bond and Performance Covenant” (see 1/29/2026 email, 1:55pm, from Erick Martinez to Mike Willis)
- Attachments to May 5, 2026, 3:51 email from Jenny Twentyman to Robert Canady
- Document titled “Serverfarm Edit Natural Gas Sales Agreement - Draft 12-17. RH Comments.docx” (see 12/29/2025 email from Mike Jewell to Frank Turner)
- Document titled “Covington NATURAL GAS FACILITIES AGREEMENT”
- Document titled “SERVERFARM – Transportation Agreement”
- Document titled “Transco reimbursement interconnect agreement” (and any other missing exhibits to “Covington Data Center Sales Agreement”)
- The “easement doc” attached to the November 7, 2025, 2:00pm email from Will Whittington to Mike Jewell
- The three attachments from the September 17, 2025, 4:19pm email from Frank Turner to Audra Gutierrez (email subject: Load Ramp Revisions)

Thanks very much for your help,

William Snow
Associate Attorney
wsnow@selc.org

Southern Environmental Law Center
Ten 10th Street NW, Suite 1050
Atlanta, GA 30309

Office: 404.521.9900
Direct: 470.763.6556
selc.org

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From: Audra Gutierrez <agutierrez@cityofcovington.org>
Sent: Wednesday, June 24, 2026 4:08 PM
To: William Snow <wsnow@selc.org>
Subject: RE: Open Records Request: VoltaGrid

Good afternoon Mr. Snow:

Please see the link below regarding your request. Also, the updated invoice is attached.

Wm Snow

Thanks,

Audra M. Gutierrez, GMCA-MMC, IIMC-CMC
City of Covington | City Clerk
☎770-385-2010 | agutierrez@cityofcovington.org

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From: William Snow <wsnow@selc.org>
Sent: Tuesday, June 23, 2026 1:43 PM
To: Audra Gutierrez <agutierrez@cityofcovington.org>
Subject: RE: Open Records Request: VoltaGrid

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Thank you so much for the heads up, Ms. Gutierrez. I'll look forward to hearing from you tomorrow!

All the best,

William Snow
Associate Attorney
wsnow@selc.org

Southern Environmental Law Center
Ten 10th Street NW, Suite 1050
Atlanta, GA 30309

Office: 404.521.9900
Direct: 470.763.6556
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From: Audra Gutierrez <agutierrez@cityofcovington.org>
Sent: Thursday, June 18, 2026 4:02 PM
To: William Snow <wsnow@selc.org>
Subject: RE: Open Records Request: VoltaGrid

Good afternoon Mr. Snow:

With tomorrow being a holiday, I anticipate completing the review of emails and providing the invoice by Wednesday.

Thanks,

Audra M. Gutierrez, GMCA-MMC, IIMC-CMC
City of Covington | City Clerk
☎770-385-2010 | ✉agutierrez@cityofcovington.org

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From: William Snow <wsnow@selc.org>
Sent: Wednesday, June 17, 2026 2:11 PM
To: Audra Gutierrez <agutierrez@cityofcovington.org>
Subject: RE: Open Records Request: VoltaGrid

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Hi Ms. Gutierrez,

Understood—I was confused on the order of things. That works for us, thank you. Do you have an estimated time frame for when the records will be ready?

Much appreciated,

William Snow
Associate Attorney
wsnow@selc.org

Southern Environmental Law Center
Ten 10th Street NW, Suite 1050
Atlanta, GA 30309

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From: Audra Gutierrez <agutierrez@cityofcovington.org>
Sent: Wednesday, June 17, 2026 12:03 PM
To: William Snow <wsnow@selc.org>
Subject: RE: Open Records Request: VoltaGrid

Good afternoon Mr. Snow:

I was going to invoice you when the records are ready. I do not think will be the full estimate amount. I hope that is satisfactory.

Thanks,

Audra M. Gutierrez, GMCA-MMC, IIMC-CMC
City of Covington | City Clerk
☎770-385-2010 | agutierrez@cityofcovington.org

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From: William Snow <wsnow@selc.org>
Sent: Tuesday, June 16, 2026 3:19 PM
To: Audra Gutierrez <agutierrez@cityofcovington.org>
Subject: RE: Open Records Request: VoltaGrid

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Hi Ms. Gutierrez,

Is there any word on an invoice for fulfilling this GORA request?

We look forward to hearing from you,

William Snow
Associate Attorney
wsnow@selc.org

Southern Environmental Law Center
Ten 10th Street NW, Suite 1050
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From: William Snow
Sent: Wednesday, June 10, 2026 3:56 PM
To: 'Audra Gutierrez' <agutierrez@cityofcovington.org>
Subject: RE: Open Records Request: VoltaGrid

Thank you, Ms. Gutierrez. Looking forward to seeing this soon,

William Snow
Associate Attorney
wsnow@selc.org

Southern Environmental Law Center
Ten 10th Street NW, Suite 1050
Atlanta, GA 30309

Office: 404.521.9900
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From: Audra Gutierrez <agutierrez@cityofcovington.org>
Sent: Tuesday, June 9, 2026 9:15 AM
To: William Snow <wsnow@selc.org>
Subject: RE: Open Records Request: VoltaGrid

Good morning Mr. Snow:

Thank you for your response. I will get on this and send you an invoice when it is ready.

Thanks,

Audra M. Gutierrez, GMCA-MMC, IIMC-CMC
City of Covington | City Clerk
☎770-385-2010 | ✉agutierrez@cityofcovington.org

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From: William Snow <wsnow@selc.org>
Sent: Thursday, June 4, 2026 5:21 PM
To: Audra Gutierrez <agutierrez@cityofcovington.org>
Subject: RE: Open Records Request: VoltaGrid

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Hi Ms. Gutierrez,

I apologize for the trouble. We will settle for the whole production of 1,483 files you had previously identified. We are prepared to pay the search and retrieval costs.

Thanks,

William Snow
Associate Attorney
wsnow@selc.org

Southern Environmental Law Center
Ten 10th Street NW, Suite 1050
Atlanta, GA 30309

Office: 404.521.9900
Direct: 470.763.6556
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From: Audra Gutierrez <agutierrez@cityofcovington.org>
Sent: Wednesday, June 3, 2026 2:38 PM
To: William Snow <wsnow@selc.org>
Subject: RE: Open Records Request: VoltaGrid

Good afternoon Mr. Snow:

I checked with IT and they stated it would be time consuming and costly to search for the listed keywords. Please let me know how you would like to proceed.

Thanks,

Audra M. Gutierrez, GMCA-MMC, IIMC-CMC
City of Covington | City Clerk

☎770-385-2010 | agutierrez@cityofcovington.org

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P.O. Box 1527 | Covington, GA 30015
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From: William Snow <wsnow@selc.org>
Sent: Monday, June 1, 2026 11:16 AM
To: Audra Gutierrez <agutierrez@cityofcovington.org>
Subject: RE: Open Records Request: VoltaGrid

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Good morning, Ms. Gutierrez,

Thank you for checking—I'll be happy to talk things out over the phone today as well, if it would be helpful to figure things out.

William Snow
Associate Attorney
wsnow@selc.org

Southern Environmental Law Center
Ten 10th Street NW, Suite 1050
Atlanta, GA 30309

Office: 404.521.9900
Direct: 470.763.6556
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From: Audra Gutierrez <agutierrez@cityofcovington.org>
Sent: Thursday, May 28, 2026 3:11 PM
To: William Snow <wsnow@selc.org>
Subject: RE: Open Records Request: VoltaGrid

Good afternoon Mr. Snow:

I will check with IT.

Thanks,

Audra M. Gutierrez, GMCA-MMC, IIMC-CMC
City of Covington | City Clerk
☎770-385-2010 | ✉agutierrez@cityofcovington.org

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From: William Snow <wsnow@selc.org>
Sent: Wednesday, May 27, 2026 3:54 PM
To: Audra Gutierrez <agutierrez@cityofcovington.org>
Subject: RE: Open Records Request: VoltaGrid

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Hi Ms. Gutierrez,

My sincerest apologies – I was not clear with my ask in the last email. What I meant was for those search terms to be applied to the universe of 1,483 emails you had already pulled, but I also realize that you might not have the software capabilities to apply such a long list of search terms. Could you maybe give me a call tomorrow so we can hash everything out at once?

Thanks very much for your patience,

William Snow

Associate Attorney
wsnow@selc.org

Southern Environmental Law Center
Ten 10th Street NW, Suite 1050
Atlanta, GA 30309

Office: 404.521.9900
Direct: 470.763.6556
selc.org

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From: Audra Gutierrez <agutierrez@cityofcovington.org>
Sent: Tuesday, May 26, 2026 3:51 PM
To: William Snow <wsnow@selc.org>
Subject: RE: Open Records Request: VoltaGrid

Good afternoon Mr. Snow:

Our IT Department ran another search with **just 3 key words** "service" – "permit" - "electric" – from 01/01/2025 thru 05/01/2026 that resulted in 581,052 matches. In the initial search, the key words VoltaGrid and Serverfarm were used.

Thanks,

Audra M. Gutierrez, GMCA-MMC, IIMC-CMC
City of Covington | City Clerk
☎770-385-2010 | ✉agutierrez@cityofcovington.org

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P.O. Box 1527 | Covington, GA 30015
☎ (770) 385 - 2000

From: William Snow <wsnow@selc.org>
Sent: Monday, May 18, 2026 6:10 PM
To: Audra Gutierrez <agutierrez@cityofcovington.org>
Subject: RE: Open Records Request: VoltaGrid

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Good evening Ms. Gutierrez,

Please forgive my late reply. We want to make this review less burdensome, so I've supplied a list of search terms below that hopefully should narrow the universe down to a much more manageable number. Would you let me know how many files come up when you enter any of the search terms below?

"territory" or "territorial"
"Georgia Power" or "GP"
"electric" or "electricity"
"supply" or "supplier"
"serve" or "service"
"cogeneration" or "cogen"
"permit"
"PSC" or "Public Service Commission"
"annex"

Thanks very much,

William Snow
Associate Attorney
wsnow@selc.org

Southern Environmental Law Center
Ten 10th Street NW, Suite 1050
Atlanta, GA 30309

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From: Audra Gutierrez <agutierrez@cityofcovington.org>
Sent: Friday, May 15, 2026 4:42 PM
To: William Snow <wsnow@selc.org>
Subject: RE: Open Records Request: VoltaGrid

Good afternoon Mr. Snow:

I did delete the attorney-client privileged emails and there are still 1,485 emails.

Thanks,

Audra M. Gutierrez, GMCA-MMC, IIMC-CMC
City of Covington | City Clerk
☎770-385-2010 | ✉agutierrez@cityofcovington.org

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From: William Snow <wsnow@selc.org>
Sent: Thursday, May 14, 2026 12:38 PM
To: Audra Gutierrez <agutierrez@cityofcovington.org>
Subject: RE: Open Records Request: VoltaGrid

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Hi Ms. Gutierrez,

My apologies for the delayed response. Thank you for that explanation—we understand this better now. To the extent that this cuts down on your review time, we would also note that because we are only asking for communications shared with a third party, attorney-client privilege should not be present as an issue to screen for. And if it would cut your

review time further, we would be happy to offer search terms that could limit the scope of the search and production.

Thanks very much,

William Snow
Associate Attorney
wsnow@selc.org

Southern Environmental Law Center
Ten 10th Street NW, Suite 1050
Atlanta, GA 30309

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From: Audra Gutierrez <agutierrez@cityofcovington.org>
Sent: Tuesday, May 12, 2026 1:10 PM
To: William Snow <wsnow@selc.org>
Subject: RE: Open Records Request: VoltaGrid

Good afternoon Mr. Snow:

My department consists of only two employees: myself and an assistant clerk who was hired three months ago and has not yet been fully trained to handle open records requests. As a result, I am currently the lowest-paid employee qualified to perform this work.

Thanks,

Audra M. Gutierrez, GMCA-MMC, IIMC-CMC
City of Covington | City Clerk
☎770-385-2010 | ✉agutierrez@cityofcovington.org



Covington City Hall
2194 Emory Street N.W. | Covington, GA 30014
P.O. Box 1527 | Covington, GA 30015
☎ (770) 385 - 2000

From: William Snow <wsnow@selc.org>
Sent: Monday, May 11, 2026 4:48 PM
To: Audra Gutierrez <agutierrez@cityofcovington.org>
Subject: RE: Open Records Request: VoltaGrid

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Ms. Gutierrez,

Thank you very much for getting back to me. We believe this estimate is probably unreasonably high, as it reflects an hourly rate of $46.08. Under GORA (at § 50-18-71), the fee estimate charged must not be higher than the hourly rate for the lowest paid employee capable of doing the search and retrieval.

Could you please look into your calculation and either revise or explain why the charge should be so high?

Much appreciated,

William Snow
Associate Attorney
wsnow@selc.org

Southern Environmental Law Center
Ten 10th Street NW, Suite 1050
Atlanta, GA 30309

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From: Audra Gutierrez <agutierrez@cityofcovington.org>
Sent: Monday, May 11, 2026 3:27 PM
To: William Snow <wsnow@selc.org>
Subject: Open Records Request: VoltaGrid

Good afternoon:

The estimate for your records request:

The first 15 minutes are free.

City Clerk's Office 25.08 hours Total $1,173.90 (review of 1,505 emails for relevance, redaction, and attorney-client privilege)

Please let me know it you approve the estimate.

Thanks,

Audra M. Gutierrez, GMCA-MMC, IIMC-CMC
City of Covington | City Clerk
☎770-385-2010 | ✉agutierrez@cityofcovington.org

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