STATE OF GEORGIA

PUBLIC SERVICE COMMISSION

FINAL REPORT OF THE INDEPENDENT EVALUATOR

REGARDING

2022/2023 UTILITY SCALE RENEWABLE
REQUEST FOR PROPOSALS

May 27, 2021

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FINAL REPORT OF THE INDEPENDENT EVALUATOR
RE: GEORGIA POWER COMPANY'S
2022/2023 UTILITY SCALE RENEWABLE REQUEST FOR PROPOSALS

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I. EXECUTIVE SUMMARY

Accion Group, LLC, served as the Independent Evaluator ("Accion" or "IE"), for Georgia Power Company's ("GPC", "Georgia Power" or "the Company") 2022/2023 Utility Scale Renewable Request for Proposals ("2022/2023 Renewable RFP" or "RFP"). The RFP sought a total of between 800 and 1,200 Megawatts ("MW"), of renewable energy from several types of renewable resources with in-service dates in 2022 and 2023: "500 MW for all retail customers, 300 MW for subscription by existing CRSP-eligible C&I customers, and up to 400 MW for subscription by CRSP-eligible customers with qualifying new load additions." [1]

This RFP will serve as the first of two solicitations to meet the utility scale requirements of the GPC 2019 Integrated Resource Plan, adopted by the Georgia Public Service Commission ("GPSC" or "Commission") on July 29, 2019. Collectively, the two solicitations seek 2,000 MW of utility scale renewable resources. Of those 2,000 MW, half will be dedicated to retail customers, and half will supply Georgia Power's Customer Renewable Supply Procurement ("CRSP") Program.

The RFP sought renewable energy from different types of renewable resources defined in the final RFP documents as follows:

> *Georgia Power seeks to procure between 800 MW and 1,200 MW of renewable energy from different types of renewable resources. The renewable energy must be sourced from one or more of the following types of sustainable, perpetual, or renewable fuels: (**i**) solar photovoltaic (fixed or tracking); (**ii**) solar thermal; (**iii**) wind; (**iv**) geothermal (natural or enhanced); (**v**) biomass or biogas; (**vi**) hydro; or (**vii**) other renewable fuel or technology (as further described in the paragraph below). The Energy must be bundled with the Environmental Attributes and all Electrical Products produced by or related to the Facility ("**Renewable Energy**").*
>
> *Georgia Power will accept bids for (**1**) single, unique proposals; (**2**) proposals that combine resource options into a single unique proposal (e.g., a wind and solar combination); provided, however, that each resource must individually meet the size requirements of this RFP; (**3**) proposals that are either mutually exclusive or contingent upon one another; and (4) proposals that include an on-Site energy storage option (a "**Storage Device**"); provided, however, the Storage Device must be charged solely by the Renewable Resource for the Term of the power purchase agreement ("**PPA**").* [2]

Throughout the RFP process the Commission Staff ("Staff") was intimately involved and worked closely with the IE to ensure the GPSC rules were followed, and that fairness was extended to every Bidder. Participation of the Staff was helpful as it provided perspective that was unique from that of the Company, Bidders, and the IE and throughout the RFP process the Staff was actively involved alongside the IE.

[1] RFP at 1.

[2] RFP at 2.

During the development of the RFP, potential Bidders and interested persons were invited to assist in the drafting of the RFP parameters through an extensive comment process, where persons were encouraged to provide written comments through the IE Website, https://gpcrenew19.accionpower.com ("Website") on all aspects of the RFP, including the draft RFP and pro-forma PPA Documents. The input from Bidders and interested persons brought value through the incorporation of refinements that avoided confusion and maximized the prospects for creative responses by Bidders.

Georgia Power opted not to submit a self-build proposal. However, the Company was open to accepting turnkey proposals in response to this RFP, as any proposal for the transfer of ownership of the Facility to the Company following the completion of construction at or before the Commercial Operation Date ("COD"). Additionally, as stated in the RFP, the Company would consider projects that offered GPC an option to purchase the Facility after the Facility has reached Commercial Operation. The RFP was open to Bids from GPC Affiliates, including Southern Power.

A robust response was received from the market. Seventy-two (72) Bids from twenty-five (25) Bidders were included in the evaluation process. Bids totaling 11,322 MW were evaluated. Detail of the number of offers is presented in Sections VII and VIII of this Report, entitled respectively, "BID RECEIPT" and "BID DETAILS".

The opportunity for Bidders to simultaneously participate in solicitations for multiple periods and different products, and to submit multiple Bid options for one, proved to be a successful strategy both in the number of Bids received and range of pricing options that were evaluated.

The IE was available to Bidders throughout the process. The RFP Website provided a direct message feature through which Bidders could contact the IE. The identity of the IE was well publicized, and Bidders could easily contact the IE using a link on each page of the RFP Website. The IE reviewed all comments and questions posted on the RFP Website, and reviewed each answer prepared by the Evaluation Team in response to questions before each response was sent to Bidders. The IE monitored all post-Bid message exchanges between Bidders and the Evaluation Team. Also, the IE responded to every direct contact from a Bidder. No Bidder contacted the IE claiming the RFP process, bid process, or any aspect of the RFP was unfair, discriminatory, or in any way was biased for or against any Bidder or type of Bidder.

This RFP was conducted using a pro-forma Power Purchase Agreement ("PPA"). From the outset, Bidders were advised that the PPA was not subject to negotiation or material alteration after the comment period and approval by the GPSC. The IE firmly believes GPC would not have received the quality of Bids had Bidders imagined they could "game" the process by presenting an artificially low Bid price, and then "claw back" value through negotiation of the PPA. Further, the IE believes that GPC could not have achieved a successful completion of the RFP on the schedule desired by the Commission had it been necessary to negotiate individual PPA terms. The IE believes the Commission was correct in requiring an unalterable pro-forma PPA be developed and employed for the RFP.

Additional details on the evaluation and ranking of Bids are included in the Confidential Exhibits. The net benefit of the prices of Bids on the short-list were very attractive, as discussed in more detail in the Confidential Exhibits. If the proposed PPAs for the winning Bidders are approved, and the projects completed, they will deliver excellent value for GPC ratepayers.

The IE believes the RFP was designed to be fair and adhered to the rules of the GPSC. All Bidders had access to the same information at the same time and had multiple opportunities before the Bid process commenced, through the comment process, to identify what they believed to be shortcomings in the RFP, and to offer suggestions for making the RFP attractive to competitive Bidding. No Bidder contacted the IE with a complaint about the RFP process, standards, or execution. The IE believes the RFP was conducted fairly and that all Bids were evaluated using the same standards and procedures. Further, the IE conducted an independent evaluation of all Bids and concurs with the final selections made by Georgia Power.

II. INDEPENDENT EVALUATOR

A. ABOUT THE INDEPENDENT EVALUATOR

With more than 40 years of in-depth experience in electric, gas, water, and renewable utilities, Accion Group's diverse consortium of consultants provides insightful, candid, and practical advice to the utility industry and their associated government regulatory bodies. Headquartered in Concord, New Hampshire, with a branch office in suburban Washington, D.C. and consulting affiliates nationwide, Accion's specialties range from competitive procurement and utility management to construction monitoring and nuclear decommissioning.

Since its incorporation in 2001, Accion has been routinely involved in high-profile consulting engagements, thus securing a reputation as one of the premier firms providing independent review of utility procurement practices. Accion has served as Independent Evaluator, Independent Monitor, or Independent Observer to state commissions on over 100 competitive solicitations in markets including California, Hawaii, Georgia, Colorado, Montana, North Carolina, South Carolina, Oregon, Florida, and Arizona. Accion Group has also assisted utilities in the preparation for, and the conduct of, power supply solicitations in Maryland, Massachusetts, and Nevada. Having reviewed proposals for generation by renewable sources (including wind, solar, bio-mass, wave action, storage, low-head hydroelectric, geothermal, and methane capture), as well as for generation by new-build facilities using nuclear power, natural gas, and coal fuels, our consultants are well-versed in the subtleties of utility procurement practices. Our ultimate goal as IE is the same as the purchasing utility and state regulators: ensuring the solicitation obtains the best deal possible for ratepayers, given current market and regulatory conditions in terms of both price and non-price factors.

B. THE IE'S ROLE IN THE RFP

As IE, Accion reviewed the process designed by the Evaluation Team prior to releasing the RFP. This review included the following:

- The Company's efforts to identify prospective Bidders and publicize the RFP;
- The terms and conditions that would control both the RFP process and any resulting contracts;
- The evaluation criteria and methodology to be employed;
- The procedures employed to ensure that all Bidders would have access to the same information at the same time;
- The form and content of all draft RFP documents;
- The procedures designed to encourage Bidder input on the quality and content of RFP documents and RFP procedures; and
- The design and implementation of the affiliate Code of Conduct protocols.

Accion Group designed and operated the Website for the receipt of Bids, which hosted and captured for review all RFP-related information and all Website activity. The Website facilitated our ability to closely monitor communications during the RFP process. Accion Group participated in the Bidders' Conference Webinar ("Conference" or "Bidders' Conference"). All questions from Bidders were submitted on the Website and the Evaluation Team's response to each question was reviewed by the IE prior to the question being answered on the Website. Accion also reviewed the comments provided by the Bidders before the RFP was released, discussed those comments that appeared that suggested changes to the RFP and PPA with the Evaluation Team, and reviewed the Evaluation Team's responses to the comments, before forwarding them back to the respective Bidders.

III. BACKGROUND

The purpose of the RFP was to continue the Commission's and the Company's commitment to electric supply diversity, and to promote new renewable generation opportunities in Georgia. As stated in its RFP, Georgia Power issued this RFP "to continue the expansion of renewable development for the benefit of Georgia Power's customers." [3]

On May 5, 2020, the Evaluation Team conducted a Bidders Conference via webinar.[4] The Evaluation Team and the IE provided presentations and answered questions during the Conference. All questions were recorded, and written responses were posted on the RFP Website, along with copies of presentation materials, so that all Bidders, regardless of whether they participated in the Conference, would have access to the same information.

Bidders were afforded multiple opportunities to assist in the preparation of the RFP and the pro-forma PPAs through anonymous comments submitted through the RFP Website. All comments were given thorough review by the Evaluation Team, the IE and the Commission Staff before final RFP documents were presented to the Commission for approval.

The Company filed for approval of the Final Draft documents for the RFP on June 19, 2020, and the Commission approved the Final Documents by Order dated June 22, 2020. [5]

Once approval of the program was received from the Commission, details of the Utility Scale Procurement were posted on the Independent Evaluator's Website on June 19, 2020, and the Bid Form ("Bid Form") was released on the RFP Website. All Bids were received through the RFP Website, with the Bidding period ending on July 15, 2020.

The Evaluation Team and the IE commenced evaluations immediately after the Bid process closed. During this period, clarifying requests were made of Bidders through the RFP Website and extensive evaluation was conducted of each Bid and the transmission impact of each Bid. The Commission Staff was actively involved in

[3] RFP at 1

[4] While the Bidders Conference was originally scheduled to be held both in-person and via webinar, the COVID-19 pandemic resulted in a webinar-only conference.

[5] Georgia Public Service Commission Order Approving of Final RFP and PPA Documents with Modifications, Docket #42886, Document #181607.

each round of evaluation and kept advised by the IE of each phase of the evaluation. The evaluation process is discussed below.

Once the final Short List of Bids was established, discussions were held with the Finalists. The IE and Commission Staff participated in each meeting with the Finalists. These discussions produced refinements to the pro-forma PPAs for the sole purpose of confirming acceptance of the pro-forma PPA terms. No Bidder was permitted to re-price a Bid or otherwise shift the risks and benefits between the Bidder and GPC. The PPA refinements were incorporated into the final PPAs presented to Bidders for execution.

IV. PROCUREMENT GUIDELINES

With the cooperation of Staff, Accion Group worked with GPC to design a competitive Procurement Website to securely and efficiently manage the RFP process. Structured on Accion Group's proprietary Procurement Website platform, the underlying principles of the IE's RFP Procurement Website were to execute a solicitation process that met both GPSC and Federal Energy Regulatory Commission ("FERC") standards while providing information to Bidders in an equal, understandable, and transparent manner, and allowing all registrants to participate in the bidding process with confidentiality. To meet GPSC and FERC standards, the IE's Website was designed to provide complete security for confidential documents and anonymity for Bidders, thus avoiding unequal treatment or unfair bias towards or against any Bidder. The Website facilitated exchanges with interested parties before the Bid date, managed Bidder Conference information, and handled Bids and post-Bid exchanges. During the RFP process, which began November 15, 2019, through the date of this Report, the Procurement Website was accessed 225,542 times. Registrants on the RFP Website logged on 8,048 times, and Public Users accessed the Site 37,442 times.[6] "Test Accounts" were used by the IE to access the Site for administrative and maintenance tasks. The substantial number of times individuals accessed the RFP Website indicated the ability of the Public and potential Bidders to access RFP information, and to participate in the RFP through the secure IE Website.

A. COMPLIANCE WITH FERC GUIDELINES

Because the RFP was open to GPC affiliates, Accion applied the FERC standards for competitive solicitations. Accion is a well-known and respected firm with significant experience as an Independent Evaluator or Independent Monitor for competitive solicitations by electric utilities. In the past 17 years Accion served as IE for over 100 solicitations, a number of which were open to affiliate bidding. Accion reports have been submitted to FERC in prior solicitations and consistently found to confirm adherence to FERC solicitation guidelines.

This RFP included the opportunity for affiliates of GPC to participate. Because wholesale sales of electric power by an affiliate must also be approved by FERC, the RFP was designed and implemented in a manner so as to meet the FERC requirements in the event an affiliate was a successful Bidder. In 1991, FERC first articulated these requirements in the case of Boston Edison Company re: Edgar Electric Company.[7] The Edgar case established three criteria that must be met if an affiliate is to be awarded a contract from an RFP: (1) the RFP

[6] Commission Staff, Company Personnel, the IE and Site Administrator logons are included in the total number of times Registrants logged on to the Site. "Public User" access is a record of visits to the IE Website without logging on. These visits included viewing the schedule and announcements, which were available to non-registrants.

[7] *Edgar Electric Company*, 55 F.E.R.C ¶ 61,382 (1991)

must be designed and implemented without undue preference for the affiliate; (2) the analysis of proposals received must not favor the affiliate, particularly as to non-price factors; and (3) if the affiliate is selected for a contract, its selection must be based on a reasonable combination of price and non-price factors. These Edgar criteria were intended to both ensure ratepayers are protected and that transactions with an affiliate are above suspicion. On July 29, 2004, the FERC issued "Order Granting Authorization to Make Affiliate Sales"[8], which remains the standard of today and contained a set of guidelines that FERC uses today to evaluate the fairness of RFPs and ensure it satisfies the Edgar criteria. These guidelines are commonly referred to as the Allegheny guidelines. The Allegheny guidelines are described in the Order as follows:

> *The underlying principle when evaluating an RFP under the Edgar criteria is that no affiliate should receive undue preference during any stage of the RFP. The following four guidelines will help the Commission determine if an RFP satisfies that underlying principle.*
>
> 1. ***Transparency:*** *The competitive solicitation process should be open and fair.*
> 2. ***Definition:*** *The product or products sought through the competitive solicitation should be precisely defined.*
> 3. ***Evaluation:*** *Evaluation criteria should be standardized and applied equally to all Bids and Bidders.*
> 4. ***Oversight:*** *An independent third party should design the solicitation, administer bidding, and evaluate Bids prior to the company's selection.*[9]

Whether serving as IE or Independent Monitor, Accion Group expects utilities to adhere to the highest standards for fairness and openness when conducting a competitive solicitation process. Similarly, Accion expects utilities to establish and follow RFP protocols that are free from actual or perceived bias. To this end, we look to the FERC-established Edgar criteria, along with the standards established by the Commission for competitive bidding, to judge the quality of GPC's RFP process. To ensure transparency and fairness throughout the RFP process, GPC used Accion Group's IE Procurement Website platform to transmit the RFP, all related RFP documents and RFP information, and to communicate with Bidders during the solicitation process. Doing so facilitated GPC's compliance with FERC's Allegheny guidelines and the Commission's rules on Request for Proposals Procedure under Chapter 515-3-4, "Integrated Resource Planning," of the Commission's General Rules.

As IE, Accion found that the Company's procurement process adhered to the FERC-established Allegheny guidelines outlined above. The IE Website functioned in a manner that met the strict protocols of transparency, definition, evaluation and oversight, as defined by FERC. In the remainder of this section, we present a detailed overview of how each of the four FERC Guidelines was met and documented on the Website.

1. Transparency Principle

Transparency is the free flow of information to all parties. (108 F.E.R.C ¶ 61,082 at 23)

The transparency principle requires the RFP process to be open and fair to all participants. The IE Website used for the GPC 2022/2023 Renewable RFP provided all parties with Procurement Website access to the same information at the same time. Bidders were required to use the Website for access to all information, including

[8] *Allegheny Energy Supply Company, LLC,* 108 F.E.R.C ¶ 61,082 (2004)

[9] 108 F.E.R.C ¶ 61,082 (2004) at 22

documents provided by the Company and answers to questions posed by Bidders. All solicitation information was date-stamped when posted, and all RFP documents and data were able to be accessed by registered users at any time. Whenever a document was uploaded, a question was posed, an answer posted, or a calendar event listed, all registered users of the Website were able to view this information immediately. Automatic emails were sent to every registered user notifying them of the new information available and directing users to the specific site page where it could be located.

> *Instead of individually inviting specific Bidders, the utility should allow all interested parties to Bid on the RFP. All aspects of the competitive solicitation should be widely publicized. (108 F.E.R.C ¶ 61,082 at 23)*

The IE Procurement Website allowed all interested parties to register for complete access to the procurement site. Any individual or company visiting the site was welcomed to complete a pre-qualification questionnaire and submit their registration as a potential Bidder. Pre-qualification questionnaires were evaluated against set criteria to determine Bidder eligibility. Moreover, users could register as "non-Bidders" to have full access to the site, except for individualized, confidential Bid Books ("Bid Book"). The IE Procurement Website was available to the public and was also easily accessible via search engine and the Commission's Website. Announcements about the RFP were posted on the Website and available to the public. Registered users were sent automatically generated notices whenever an announcement was posted. The Website preserved a copy of every announcement, even after it was removed from public viewing.

> *"Any communication between RFP issuer and Bidder that are not part of the Bid should be made available to all other Bidders." (108 F.E.R.C ¶ 61,082 at 23)*

All communication between GPC and Bidders that was not specific to an individual Bid was made available to other Bidders through pages accessible on the IE Procurement Website. For example, all users registered to the site were able to access the "Q&A" page, where questions and answers were posted while maintaining Bidder confidentiality. When Bidders posed questions to GPC, the questions, along with the answers, were posted to the "Q&A" page and an automatic email was sent to all registered users alerting them of new communication posted to the site. The Procurement Website's secure data collection feature ensured that the identity of the Bidders posing the questions remained anonymous. All questions posted during the Bidders' Conference were recorded and subsequently posted on the Website, along with answers from GPC.

Any communication between the Bidder and the Evaluation Team relating to the Bidder's specific Bid proposal remained confidential, and was retained in a secure folder accessible only by the Bidder, the Evaluation Team, Staff and the IE.

> *Negotiation may occur after the bidding; for example, when a Short List has been compiled or a winner has been selected. (108 F.E.R.C ¶ 61,082 at 26)*

The Procurement Website was designed to manage the exchange of documents during post-Bid negotiations, mitigating any transparency concerns and providing a continued online conduit for information exchanges during the RFP process. Each Bidder received a secure Bid Book, through which information was exchanged with the Evaluation Team. These Bid Books contain folders specifically designated for all messages between the Bidder and the Evaluation Team, allowing for postings of contracts and negotiation-related communications. All communications and post-Bid negotiations were monitored by the IE, and the IE attended

each negotiation session, either in person or via teleconference. Each post-Bid document was date-stamped when uploaded to the respective Bid Book, providing the Company and the Commission with a permanent record of the solicitation and related negotiations.

2. Definition Principle

The product or products sought through the RFP should be defined in a manner that is clear and nondiscriminatory. (108 F.E.R.C ¶ 61,082 at 27)

Draft RFP documents were posted on the Website and anonymous comments were solicited from prospective Bidders, thereby ensuring that the products sought through the final version of the RFP were defined in a clear manner understandable to all Bidders. The Website also featured a "Q&A" page on which any registered user to the Website was able to post questions anonymously regarding products being sought in the RFP. The question submitted and the answer provided by the utility, Commission Staff, or the IE, were accessible to registered users immediately after the information was posted.

If there are changes in the product specification, rebids should be allowed.

(108 F.E.R.C ¶ 61,082 at 27)

3. Evaluation Principle

RFPs should clearly specify the price and non-price criteria under which Bids will be evaluated. (108 F.E.R.C ¶ 61,082 at 29)

The RFP documents provided clear and complete product definitions and full disclosure of the evaluation process. With respect to this aspect of the RFP, no prospective participants submitted questions or clarifications to the IE Website regarding either the product definitions or the evaluation process included in the RFP materials. In addition, Accion Group found the RFP documents to be thorough, accurate, and complete. Thorough RFP documents, opportunity for clarification and questions, and equal access to all information regarding the products sought by GPC gave all prospective participants clear information as to the products being sought and the competitive solicitation process to be employed to evaluate the proposals.

RFP issuer and Bidders will usually need to divulge commercially sensitive information in the solicitation process. (108 F.E.R.C ¶ 61,082 at 31)

In order to ensure confidentiality and security throughout the online bidding process, the Procurement Website featured a 2048 Bit security certificate to ensure the privacy and security of all transactions made through the solicitation platform. Furthermore, every Bidder automatically received a secure Bid Book folder for all Bid-related documents. This Bid Book served as a secure repository of confidential Bid-related information enabling Bidders, the IE, and the Evaluation Team to securely post relevant documents and communications while maintaining Bidder anonymity and ensuring that commercially sensitive information was not inadvertently released to the public or to other Bidders. Only the named Bidder, the IE, certain Commission Staff members, and the Evaluation Team were able to access documents in each Bid Book folder.

In addition, the Website maintained comprehensive logs detailing when a user was logged in, and what actions were taken while on the Website (such as page views or document uploads and downloads). As a result, any questions regarding privacy or questionable access to documents could be answered by reviewing Website access and user logs, which confirm every action taken on the site.

4. Oversight Principle

Effective oversight of competitive solicitations can be accomplished by using an independent third party in the design, administration, and evaluation stages of the competitive solicitation process. (108 F.E.R.C ¶ 61,082 at 32)

Accion's oversight as IE began before the draft RFP was released for public review. All aspects of the RFP were managed through the Website, ensuring security, transparency, and confidentiality, while also creating a permanent log of all RFP activity. All registration, pre-qualification, bidding, communication, Q&A, and post-Bid exchanges were handled through the Website's secure online RFP management system, allowing Accion to provide effective oversight of the entire RFP process, and making review of the process possible with date-stamped entries. These Website records and logs serve as a permanent record of Georgia's solicitation process, providing the Evaluation Team and the Commission with the date and time of every action taken by Bidders, the utility, the Commission, and the IE.

A minimum criterion for independence is that the third party has no financial interest in any of the potential Bidders, including the affiliate, or in the outcome of the process. In this context 'independence' means that the third party's decision-making process is independent of the affiliate and all Bidders. (108 F.E.R.C ¶ 61,082 at 33)

Accion had no financial interest in any of the potential Bidders, GPC, GPC affiliates, or in the outcome of the process, and would not have accepted this engagement if there had been even the appearance of a conflict of interest. This independence is periodically reviewed by the Commission.

The independent third party should be able to make a determination that the RFP process is transparent and fair. The independent third party's role as the sole link for transmitting information between potential Bidders and RFP issuer would also help to ensure that the RFP design will not favor any particular Bidder, particularly an affiliate. (108 F.E.R.C ¶ 61,082 at 35)

The IE Procurement Website served as the sole link for all interactions between Bidders and the RFP issuer, and provided all Bidders with 24-7, real-time access to updates, documents, announcements, and all Bid-related communications and information. The Website allowed the IE to monitor every question, comment, document upload, and interaction during the solicitation. Because anonymity, confidentiality, and security are fundamental built-in components of the RFP Website platform, the IE is able to make a demonstrably strong judgment as to the fairness of Georgia's RFP process.

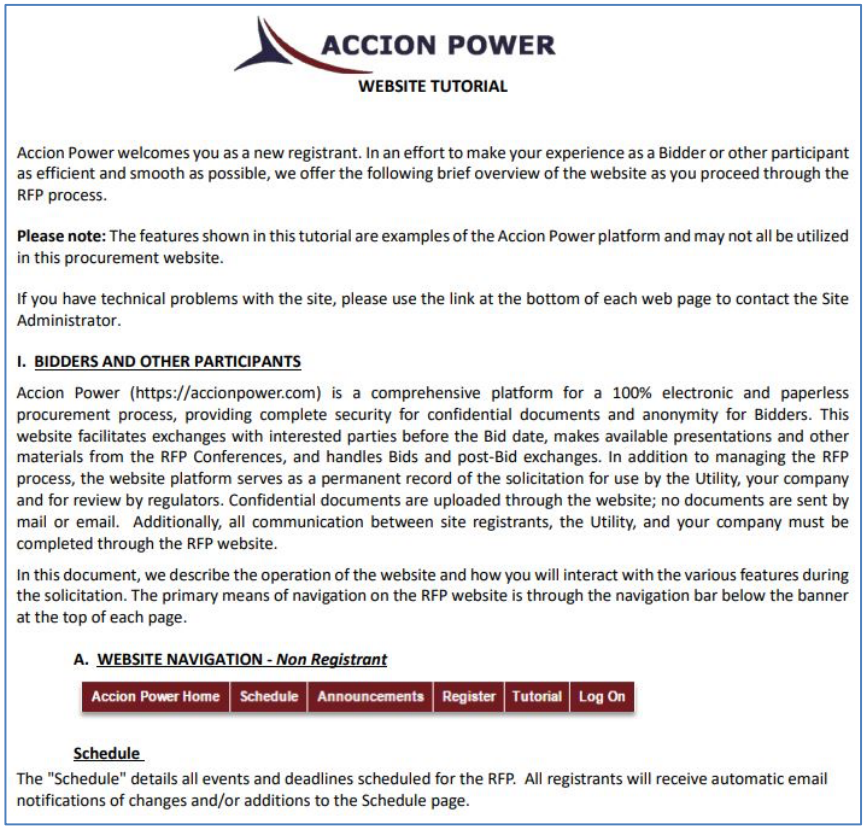
B. PROCUREMENT WEBSITE

Once the IE released the RFP Website, general information relating to the Utility Scale Renewable solicitation was available to the public, and individuals were able to register on the Website as either Bidders or Non-Bidders. Upon registration, each individual received an automatic email notification acknowledging successful registration to the Site along with an individual User ID and automatically generated password. In addition, they received an attached "Website Tutorial" explaining use of the RFP Website and Bid process.

The Tutorial was also available to all public users as a link on the Website navigation bar.

The Website was designed and employed to prevent the Evaluation Team from knowing the identity of any Bidder, prior to the IE releasing Bids at the point when the Competitive Tier was to be established. The IE screened messages and questions posted to the site and removed Bidder-specific references to maintain anonymity. After the Bid period closed the IE provided the Evaluation Team with a "price only" summary of Bids for an initial ranking of Bids. That summary removed all reference to the Bidder and the location of the proposed project. After the summary was reviewed and ranked, the IE provided the Evaluation Team with access to the Bid Books, and all of the information provided by Bidders.

Figure 1
Introduction to the Procurement Website Tutorial



ACCION POWER

WEBSITE TUTORIAL

Accion Power welcomes you as a new registrant. In an effort to make your experience as a Bidder or other participant as efficient and smooth as possible, we offer the following brief overview of the website as you proceed through the RFP process.

Please note: The features shown in this tutorial are examples of the Accion Power platform and may not all be utilized in this procurement website.

If you have technical problems with the site, please use the link at the bottom of each web page to contact the Site Administrator.

I. BIDDERS AND OTHER PARTICIPANTS

Accion Power (https://accionpower.com) is a comprehensive platform for a 100% electronic and paperless procurement process, providing complete security for confidential documents and anonymity for Bidders. This website facilitates exchanges with interested parties before the Bid date, makes available presentations and other materials from the RFP Conferences, and handles Bids and post-Bid exchanges. In addition to managing the RFP process, the website platform serves as a permanent record of the solicitation for use by the Utility, your company and for review by regulators. Confidential documents are uploaded through the website; no documents are sent by mail or email. Additionally, all communication between site registrants, the Utility, and your company must be completed through the RFP website.

In this document, we describe the operation of the website and how you will interact with the various features during the solicitation. The primary means of navigation on the RFP website is through the navigation bar below the banner at the top of each page.

A. WEBSITE NAVIGATION - *Non Registrant*

Accion Power Home | Schedule | Announcements | Register | Tutorial | Log On

Schedule

The "Schedule" details all events and deadlines scheduled for the RFP. All registrants will receive automatic email notifications of changes and/or additions to the Schedule page.

Those who registered as Bidders were automatically provided with a confidential, personal Bid Book that provided a secure platform through which all communication between the Evaluation Team and Bidders occurred; thus, it also preserved a permanent record of all interactions. Once the Bid period closed, nearly all exchanges between the Evaluation Team and a Bidder were done through the individual, secure Bid Book. Both the Evaluation Team and the Bidder could upload memos and other documents within the Bid Book, and the Website generated an automatic email to alert the other party of the interaction. Non-Bidders had access to all public information other than the Bid Form.

Communication with Bidders also consisted of the IE and GPC sending "blast" emails from the Website, which made certain that registrants received the same information pertaining to RFP developments at the same time. For example, in the days prior to the Bid submission date Bidders were sent a reminder.

The Evaluation Team, Staff, and Accion collaborated to produce Announcements, Calendar events, Frequently Asked Questions ("FAQ"), RFP documents, and a Question and Answer ("Q&A") page on the Website in order to provide all registrants with up-to-date information.

All registered users of the Website received automatic email announcements whenever an announcement, document or FAQ was posted, and when the schedule was adjusted.

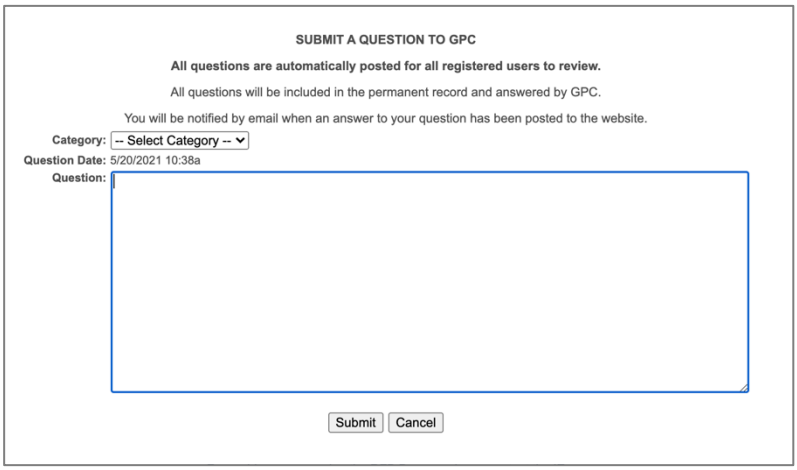
RFP Information was Accessible and Clear

a. Frequently Asked Questions (FAQs)

The FAQs page displayed answers to the most commonly asked questions about the Website and the Utility Scale Renewable RFP. GPC's FAQs were accessible to the public and covered topics including Interconnection, Technology, Contracts, Credit, Website Operation, and what to do if a Bidder had a question that involved confidential information regarding a project. If the answer to a question was not available on this page, Bidders were instructed to check the Q&A page to see if their question was previously answered. If their question was not answered on the FAQs page, they were instructed to post their question on the Q&A page, and to not contact the Evaluation Team directly.

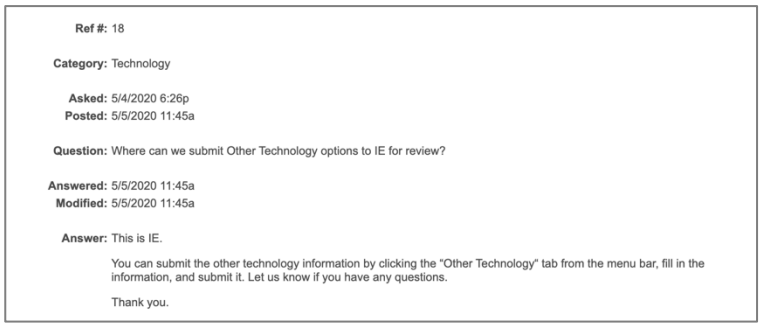
b. Questions and Answers (Q&A) All registered users of the RFP Website had the ability to anonymously submit questions via the online Q&A page, as shown in Figure 2, below.

Figure 2
Question & Answer Feature-Ask a Question



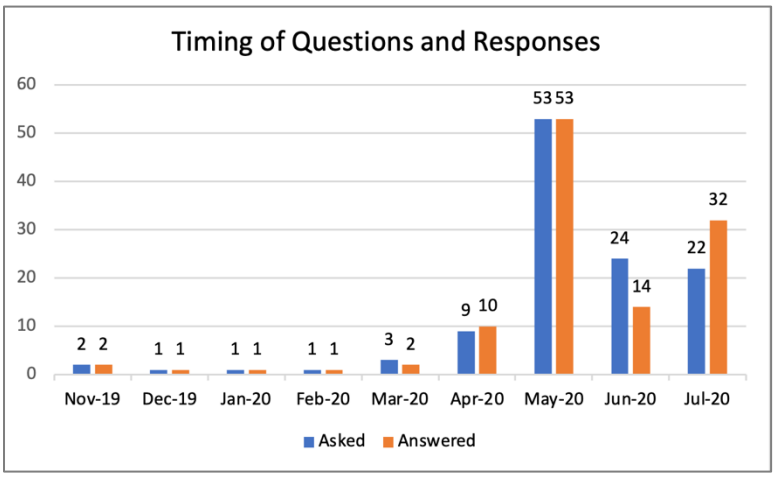
All Questions and Answers were visible to all public and registered users of the Website immediately after being posted. To avoid an inadvertent disclosure of Bidder's information, such as when a Bidder included their name in a question, the IE established a "Manager Messages Board" to transfer Bidder questions to GPC personnel. With this process the Evaluation Team responded to Bidder inquiries via the Manager Messaging and after review, the IE posted the answer on the Website Q&A page. When a question was posted, the individual who posed the question received an automatically generated email from the Website with the answer. A screenshot taken from the procurement Website Q&A page showing one question and answer (Ref #18 Posted) is shown in Figure 3. In addition, all questions and answers could be downloaded, printed, and exported to create an Excel Spreadsheet.

Figure 3



Once the Bid period closed on July 15, 2020, the opportunity to ask questions via the Q&A was terminated. Bidders no longer had access to the Q&A feature, rather they were directed to exclusively use the Message Board to ask questions and communicate with the IE and Evaluation Team regarding their Bid(s).

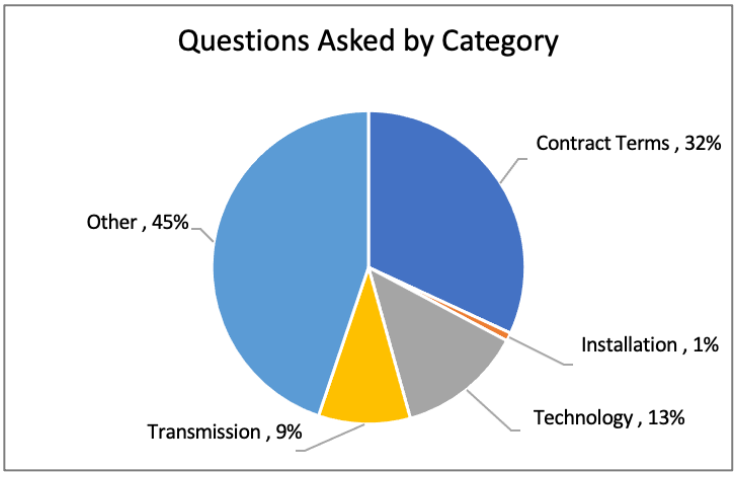
Figure 4



As of that date, a total of 116 questions had been posted on the Q&A page. Prior to selection of the Competitive Tier, GPC did not have access to, nor was it aware of the identity of Bidders, and the IE monitored and screened Messages to ensure Bidder identity was not divulged. The anonymity of the Q&A page ensured that all Bidders had immediate access to questions and answers that were posted, and that the Evaluation Team considered questions without regard for the source. The Evaluation Team or the IE answered all questions.

GPC's goal was to respond to all questions within two (2) business days, after reviewing the response with the IE and Staff. This standard has been in place for a number of years without difficulty. In this RFP the average response time was seven (7) days. In large part the delay was due to the challenges of working during the pandemic. However, the IE repeatedly advised GPC of the need to improve the processing of questions and the IE expects a better performance in the next RFP.

Figure 5



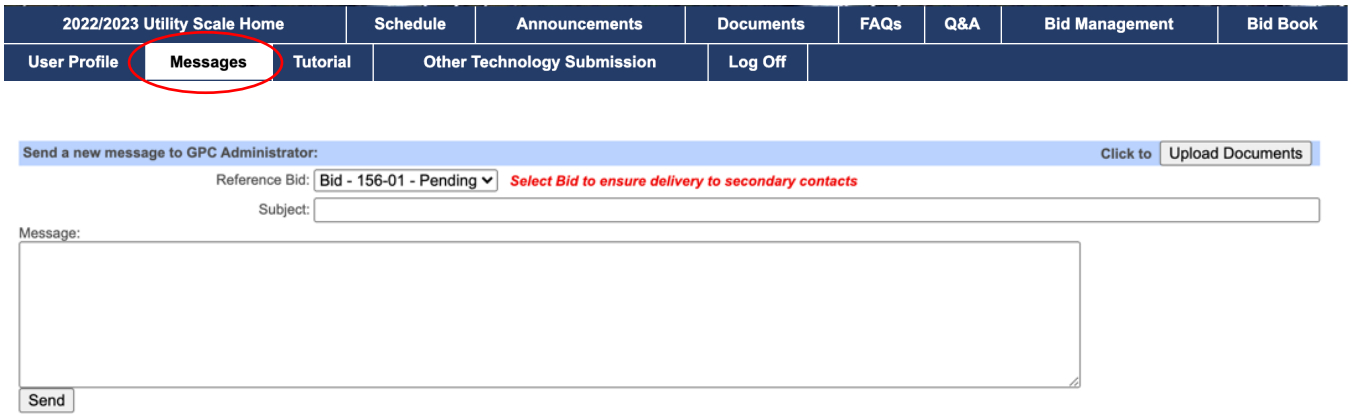
The Website sorted all questions into five categories: Installation, Technology, Transmission, Contract Terms, and Other. Registered individuals asked one (1) question regarding Installation, fifteen (15) questions regarding Technology, eleven (11) questions relating to Transmission, 37 questions relating to Contract Terms, and 52 questions relating to "Other." The sort feature identified areas of concerns without Evaluation Team having to review them for content, therefore, permitting quick distribution to subject matter experts for prompt replies.

The questions raised in the Q&A provided another opportunity for the IE, Evaluation Team, and the Staff to gauge the clarity of the RFP materials. The IE believes the public Q&A feature permitted all Bidders to have access to the same information at the same time.

c. Message Board

The "Messages" feature was activated for registered Bidders after the Bidders Conference Webinar on May 5, 2020. On the RFP Website, Bidders were able to correspond with the Evaluation Team through the confidential 'Messages' link on the navigation bar. This correspondence was monitored by the IE, but was not available to persons other than the individual Bidders and the Evaluation Team. Prior to the Bid due date, the

Messages feature was used only for questions that disclosed confidential Bid-specific information, and therefore, could not be asked via the Q&A.[10]

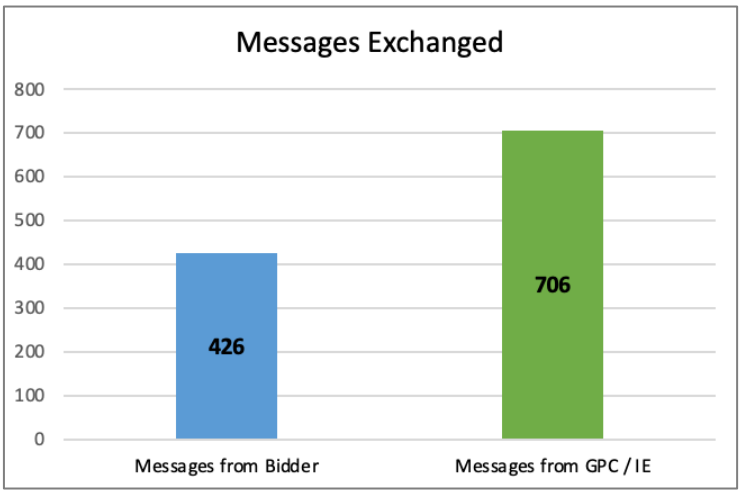


The 'Messages' page allowed Bidders to type a question into a text box and give the message a subject name. Bidders had the option to select if the message corresponded to a specific Bid. The Evaluation Team responded via the same method, and the conversation was preserved on the Messages page.

The Evaluation Team personnel referred all inquiries to the Website, and the IE believes the Evaluation Team did not provide information via email or otherwise to any prospective Bidder. All correspondence exchanged via the Message Board was preserved for review by the Commission.

There were 1,132 messages exchanged via the Message Board on the Website as of May 20, 2021. Bidders submitted 426 Messages to the Company, and 706 Messages were submitted by GPC or the IE either responding to specific Bidders' questions or requesting Bid clarifications (See Figure 6). The considerable number of communications via the Message Board signified there were robust exchanges with Bidders, but more importantly, quantified documentation of most of the exchanges without Company or IE filing intervention.

Figure 6



In addition to the confidential Message Board, for problems concerning the RFP process, or for assistance with technical problems on the Website, all Website Users could contact the IE via a link located at the bottom of every page of the Website. Users contacted the IE 10 times for assistance. As with the Messages Board, all correspondence exchanged via the Contact link was preserved for review by the Commission.

[10] As previously noted, the Q&As on the RFP Website were visible to all registered users, therefore Bidders were asked to pose Bid-specific, or confidential questions using the Message Board, for review by the Company, Staff and IE.

V. PRE-BID ACTIVITIES

The RFP was structured to strictly respect the protocols established by the Commission. To avoid the inadvertent violation of these protocols, Bidders were advised to avoid attempting direct contact with members of the GPC Evaluation Team. The Standards of Conduct were clearly established before the RFP was publicly announced and were respected by the Evaluation and the Bid Teams throughout the process. The IE is unaware of any violation of the protocols by either the Evaluation Team or the Bid Team members, from the pre-Bid period through the completion of the RFP.

A. RFP STANDARD OF CONDUCT

a. Background

To the best of the IE's knowledge, the GPC personnel adhered to the strict Standard of Conduct Requirements per the GPSC Rules concerning affiliates.

b. Teams

Individuals involved in the RFP for GPC were identified as being on the Evaluation Team, and their names were posted on the IE Website to advise Bidders of the GPC personnel who would not accept any direct contact. The Evaluation Team was responsible for developing and designing the RFP and evaluated the proposals received from the third-party Bidders.

c. Protocols

The IE believes that no member of the Evaluation Team, nor any Specialized Technical Support personnel was a member of any Affiliate Bid Team as that is defined in GPSC Rule 515-3-4-.04(3), nor have any communication with any member of any Affiliate Bid Team that would be in violation of GPSC Rule 515-3-4-.04(3). Each member of the Evaluation Team and all Specialized Technical Support personnel were familiar with GPSC Rule 515-3-4-.04(3).

GPSC Rule 515-3-4-.04(3)(d) applied to all communications.

B. LIST OF POTENTIAL BIDDERS - Rule 515-3-4-.04 (3)(e) i

When the IE RFP Website was released, a notice was sent to all individuals who previously registered with GPC as desiring to receive notice of RFPs, and to an RFP "contact list" of individuals who registered on the Accion Power Website for notification when the RFP Website was launched. In addition, the IE sent a notice of the RFP to approximately 5,000 individuals who have participated in other solicitations that Accion Group has conducted. Accordingly, the IE believes adequate public notice of the RFP occurred.

The following Announcement was posted to the RFP Website on November 15, 2019:

> ***11/15/2019 3:50:24 PM***
>
> ***Georgia Power – 2022/2023 Utility Scale Renewable RFP***
>
> *Georgia Power Company is pleased to announce the launch of its 2022/2023 Utility Scale Renewable Request for Proposals –https://gpcrenew19.accionpower.com/. More information and other schedule details concerning this RFP will be announced soon.*

Interested participants are encouraged to click on the registration tab to register to receive up-to-date information. (Ref.# 1)

On the same date the Company launched the Utility Scale Renewable Website, the following information was also emailed via the RFP Website to the public:

From: gpcrenew@acciongroup.com
To: [External Distribution List]

Subject: Georgia Power 2022/2023 Utility Scale Renewable RFP

Georgia Power – 2022/2023 Utility Scale Renewable RFP

Georgia Power Company is pleased to announce the launch of its 2022/2023 Utility Scale Renewable Request for Proposals –https://gpcrenew19.accionpower.com/. More information and other schedule details concerning this RFP will be announced soon. Interested participants are encouraged to click on the registration tab to register to receive up-to-date information.

Logged: 11/15/2019 3:38:23 PM

C. REGISTRATION TO THE RFP WEBSITE

The IE is satisfied that GPC used reasonable efforts to disseminate information about this RFP. There were 444 individuals registered on the IE Website from a total of 40 jurisdictions, including registrants from Canada. The IE believes this level of interest confirms that developers were well aware of this RFP.

The following charts shown in Figures 7 and 8 show the breakdown of all registered users on the Utility Scale Renewable RFP Website by category and by state of the registrant.

Figure 7

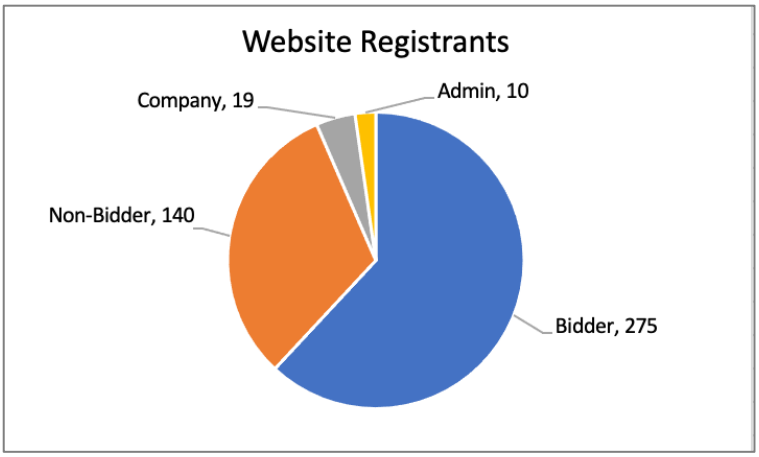


Figure 8

States Represented	# Of Registrants
Alabama	17
Arizona	8
British Columbia, CA	1
California	65
Colorado	12
Connecticut	1
Delaware	1
District of Colombia	7
Florida	28
Georgia	95
Idaho	2
Illinois	12
Indiana	1
Kansas	1
Kentucky	1
Maine	2
Maryland	4
Massachusetts	14
Michigan	3
Minnesota	5
Missouri	8

States Represented	# Of Registrants
Montana	3
Nebraska	3
Nevada	2
New Hampshire	2
New Jersey	3
New York	20
North Carolina	29
Ohio	3
Ontario, CA	5
Oregon	2
Pennsylvania	5
Quebec, CA	1
South Carolina	4
Tennessee	6
Texas	30
Utah	2
Virginia	12
Washington	6
Wisconsin	1
Total:	**427**[11]

VI. RFP DOCUMENTS

On November 15, 2019, Georgia Power Company filed with the Georgia Public Service Commission the documents the Company requested for use regarding the Utility Scale Renewable 2022-2023 RFP. The RFP Documents were prepared by the Evaluation Team based on the documents previously approved by the Commission for use in prior solicitations, such as, the 2009, 2010, 2011, 2012, 2015, ASI and ASI Prime RFPs and reviewed by the IE and Staff prior to being finalized.

The IE believes the RFP Documents provided sufficient detail to permit a qualified Bidder to understand the terms and conditions of the RFP, and to prepare a responsive Bid. The role of the IE, in consultation with the Commission Staff, was to ensure that the evaluation of Bids was conducted fairly. The IE noted that the evaluation process, as presented in the draft RFP, was descriptive, and appropriate.

As with prior RFPs, GPC made personnel available to work with the IE and the Commission Staff to review each provision of the RFP Documents. The review was comprehensive, and included consideration of all terms and conditions, regardless of whether they had been previously approved for use in a different RFP.

The IE believes the Draft RFP Documents were comprehensive and free of apparent bias for or against any Bid type, any of the identified technology options, or any Bidder anticipated to participate in this RFP. Further, the RFP made appropriate provisions to treat all Bids when submitted in an equivalent manner. The evaluation process

[11] 17 company and IE registrations did not include states or jurisdictions, resulting in this discrepancy.

was designed to treat Bids of differing terms or expected useful remaining lives, on an equal basis by using a "filler." The RFP clearly described the preferred products sought by the Company and the minimum requirements a Bid must meet in order to be considered. The RFP terms, such as pricing structure, creditworthiness, transmission access, and reliability, were equally applicable to all Bidders.

A. INPUT FROM INTERESTED PARTIES

Potential Bidders and interested persons were invited to participate in a Pre-Bid Webinar and Bidders' Conference Webinar during which they could ask questions regarding the RFP. In addition, they were encouraged to post anonymous questions, via the Q&A feature available on the Website, and Bidders were provided the opportunity to submit anonymous comments via the Website Comment feature for the purpose of suggesting changes to the Draft RFP Documents. As previously noted in this report, each question or Comment was reviewed by the Evaluation Team, Staff and the IE before being posted on the IE Website. A number of potential Bidders availed themselves of these opportunities. A more detailed discussion of Comments can be found in the "b. Comments" Section that follows.

a. Bidders Conferences

Pre-Bid Webinar

On March 19, 2020, GPC announced to potential Bidders and interested parties that there would be a Pre-Bid Webinar which was held to provide potential Bidders with insight into the environmental and transmission interconnection requirements.

> *3/19/2020 1:45:04 PM*
>
> *On April 16, 2020, beginning at 2:00 PM EPT, the 2022/2023 Utility Scale Renewable RFP Evaluation Team is hosting a Pre-Bid Webinar for interested parties and potential bidders. The Pre-Bid Webinar provides an overview of the environmental and transmission interconnection requirements. Advanced registration is required. All interested parties and potential bidders are invited to register through the Independent Evaluator's (IE) Website*
>
> *https://gpcrenew19.accionpower.com by clicking the Pre-Bid Webinar tab on the menu bar and submitting the registration form. The Pre-Bid Webinar uses the GoToMeeting platform; therefore, all participants are required to register with the GoToMeeting website 24 hours in advance. All registered parties will receive automatic updates and notices regarding the event through the IE Website. Final registration details will be provided a few days prior to the Pre-Bid Webinar.*
>
> *As a reminder, the Georgia Public Service Commission's Rules governing RFPs require all communications concerning Georgia Power's 2022/2023 Utility Scale Renewable RFP to occur through the IE Website. Failure to abide by this requirement could result in disqualification from participation in this RFP.*

The Pre-Bid Webinar presentation was posted on the RFP Website on the day of the conference in the event that a user wanted to download and review the presentation documents before the conference. 154 participants from 71 registered to participate on the Pre-Bid Webinar.

Bidders' Conference

In addition to the Pre-Bid Webinar, the Company conducted a Bidders' Conference Webinar. On March 13, 2020, in recognition of the COVID-19 pandemic, an announcement was sent to all registered users of the RFP Website that the Bidders' Conference would be hosted via webinar only. Registration was conducted via the RFP Website, and upon successful registration, confirmation was provided via email. The following shows an example confirmation for registration:

> *From: gpcrenew@acciongroup.com*
> *To: [Registrant]*
> *Subject: GPC 2022/2023 - Bidder's Conference Webinar Registration Confirmation*
>
> *Thank you for registering for the GPC 2022/2023 Pre-Bid Webinar.*
>
> *Webinar Call-in details will be emailed to registrants within 24 hours of the Webinar.*
>
> *Thank you.*
>
> *https://gpcrenew19.accionpower.com*
> *Logged: 4/2/2020 7:33:46 PM*
> *Template ID: 75*

Those who registered received call-in details the day before the Webinar via email. Any user who registered within 24 hours of the Webinar received call-in details with their registration confirmation.

GPC provided an overview of the RFP, and the IE provided an overview of the process and the RFP Website. At the Conference, the following topics were reviewed:

- The role of the IE
- Standards of Conduct
- RFP Website Use and Goals/Demonstration
- RFP Timeline
- RFP Overview
- Transmission and Interconnection Considerations
- Evaluation Methodology
- Process Evaluation Summary

168 individuals registered to attend the Bidders' Conference Webinar. Again, this was in addition to the opportunity Bidders had to learn about the RFP during the April 16, 2020, Pre-Bid Webinar.

Finally, the Bidders were given an opportunity to ask questions. The Bidders' Conference produced 28 questions, which were answered by the Evaluation Team and reviewed by the IE and Staff. The questions and written responses, as well as the presentation slides, were posted on the Utility Scale Renewable 2022-2023 RFP Website on May 11, 2020. Bidders were advised that the written responses were to be used when preparing Bids, as the oral response at the Bidders' Conference Webinar may have been incomplete.

The IE believes that providing potential Bidders with these opportunities to understand the RFP terms and conditions, when combined with the 24x7 access to ask questions via the RFP Website, provided Bidders with ample

opportunities to fully appreciate what was being sought in the solicitation.

b. Comments

An opportunity was provided for prospective Bidders to propose changes to Draft RFP and PPA Documents by providing anonymous Comments. An announcement was posted on the RFP Website on April 28, 2020, detailing the Comments opportunity:

> *4/28/2020 3:40:49 PM*
>
> *The draft 2022/2023 Utility Scale Renewable RFP and pro forma PPAs are now available for comments using the comment feature on the Independent Evaluator's (IE) Website. The documents are also available for review on the "Documents" tab of the Website. Potential bidders and interested parties have the opportunity to assist Georgia Power with finalizing the terms and conditions of the RFP and PPAs by offering comments and suggested edits to these documents. Georgia Power encourages feedback and questions regarding this RFP, which are to be submitted through the "Comments" tab. The* ***Comment Period is now open and will remain open until 12:00 PM EPT (noon) on Thursday, May 14, 2020.*** *Please note, once the RFP documents are approved by the Georgia Public Service Commission, the terms and conditions of the RFP and PPAs will be final and no substantive changes will be permitted.*

While Comments were due by 12:00 PM EPT on May 14, 2020, the IE received a request from a Bidder after this time to re-open the Comments feature. After consultation with GPC and the Staff, the IE agreed to re-open the Comments feature until May 15, 2020. The following announcement was sent regarding the change:

> 5/14/2020 3:57:26 PM
>
> The Comment feature for the GPC Utility Scale Renewable RFP has been reopened and will remain available until ***10:00 AM ON FRIDAY, MAY 15, 2020.*** All comments must be presented using the Comment feature on the IE website with red-lined suggested edits. Comments sent by bidders to the IE by email or through the message board will not be considered.

A total of 116 Comments were received and processed: 20 Comments were submitted regarding the Draft RFP, 58 regarding the Draft Pro Forma PPA Without Storage, and 38 regarding the Draft Pro Forma PPA With Storage. The IE believes the Commission was wise to include this opportunity in the competitive solicitation rules, and that it is beneficial to the process. Unless the person submitting Comments provided identification, GPC did not know the origin of any Comment, however the Staff and IE knew the source of each Comment. The IE believes the Comment process was worthwhile and the resulting documents were improved in clarity.

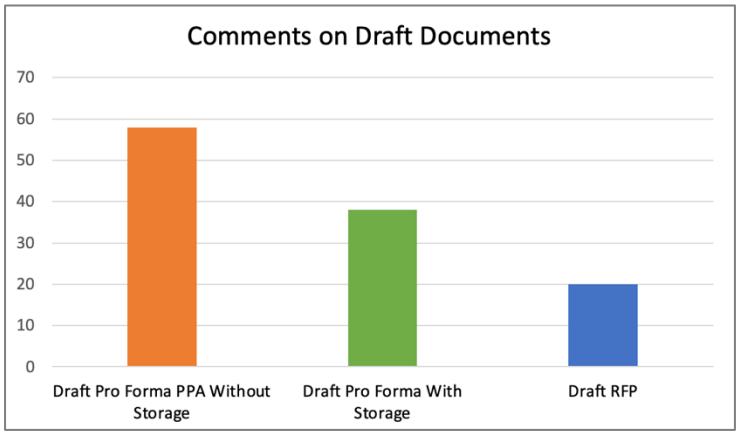
A total of nine (9) users submitted Comments to the draft documents. One user submitted 30 Comments representing 26% of all Comments made; collectively, 3 Users submitted 70 Comments, or 60% of the total Comments received. The following Table identifies the Comments submitted, filtered by Document, User, and number of Comments per User. Users have been assigned a Blind ID to maintain confidentiality.

Figure 9

Document	Blind ID	Total Comments
Draft Pro Forma PPA Without Storage	A	1
Draft Pro Forma PPA Without Storage	B	10
Draft Pro Forma PPA Without Storage	D	19
Draft Pro Forma PPA Without Storage	E	4
Draft Pro Forma PPA Without Storage	F	6
Draft Pro Forma PPA Without Storage	G	6
Draft Pro Forma PPA Without Storage	I	12
Draft Pro Forma With Storage	A	3
Draft Pro Forma With Storage	B	9
Draft Pro Forma With Storage	D	8
Draft Pro Forma With Storage	G	3
Draft Pro Forma With Storage	H	9
Draft Pro Forma With Storage	I	6
DRAFT RFP	A	4
DRAFT RFP	C	1
DRAFT RFP	D	3
DRAFT RFP	E	3
DRAFT RFP	G	3
DRAFT RFP	H	3
DRAFT RFP	I	3

A summary of changes to the RFP and PPA documents was posted to the Website, inclusive of those as a result of Comments received on the IE Website. The Final Draft RFP and Pro-Forma PPAs were also posted on the IE RFP Website.

Figure 10



The Company maintained the originally provided RFP Schedule, including release of initial draft documents on April 28, 2020, release of revised documents on May 21, 2020, and release of the final documents on the Website on June 19, 2020.

The Commission's rules provided that "[p]otential Bidders may submit written questions or recommendations to the IE regarding the draft RFP and RFP Documents in advance of the Bidder's Conference." Rule 515-3-4-.04 (3) (e) 1,iv,III,iv. This rule was honored; the IE and Staff provided a Comment Period within which to accept questions and Comments from April 28, 2020, through May 14, and then for an additional period until May 15, 2020. The IE understands this rule to permit Bidders to submit Comments, as opposed to making Comments mandatory, and that all interested parties would adhere to the same procedural schedule.

The IE believes the bidding community expected that all interested persons would be held to the same standards, and the Commission rules applied without exception. Deviation from this standard would encourage Bidders to seek special treatment and access, and would result in fewer credible Bids being received if Bidders believe competitors have the ability to manipulate the rules in any manner.

All Comments were submitted via the Comment Page on the RFP Website. The Evaluation Team, the Staff and the IE agreed on the disposition of each comment and no Bidder contacted the IE after the comment period to express concerns about the final documents, or to assert that the final RFP requirements would prevent the Bidder from presenting a proposal.

VII. BID RECEIPT

The Bid Form was released on the RFP Website for Bidders to complete on June 19, 2020. All individuals registered on the RFP Website received an email of this Announcement when it was posted to the Announcement Page on the Website.

> *6/19/2020 12:47:44 PM*
>
> The Bid Form is now available for registered Bidders on the 2022/2023 Utility Scale Renewable RFP IE Website. A sample Bid Form worksheet is available on the IE Website Documents page.
>
> Bidders are reminded that bids and accompanying Bid Fees must be electronically submitted by 12:00 pm Eastern Prevailing Time on July 15, 2020. The Bid Period will officially close at that time.
>
> Additionally, the Final Approved 2022/2023 Utility Scale Renewable RFP Document and Final Approved Pro Forma Power Purchase Agreements (PPAs) are now available on the IE Website Document Page.
>
> (Ref.# 12)

Bids were due on July 15, 2020, at 12:00 PM ET. On July 8, 2020, one week prior to the Bid closure date, the IE sent the following reminder to all Bidders registered on the RFP Website that Bids were due July 15, 2020, at 12:00 PM (EPT):

From: gpcrenew@acciongroup.com
To: [Bidder]
Subject: GPC 2022/2023 - Bid Closes in One Week

The GPC 2022/2023 Bid period is scheduled to close in one week on 7/15/2020 12:00:00 PM EPT.

Bidders should allow at least 3 hours to complete the Bid Form after assembly of required documents for upload as well as all required information.

PLEASE NOTE: Bid Fees must be submitted electronically by Wire Transfer or ACH and must be received by 12:00 PM EPT on the RFP bid due date posted on the RFP Website. Your bid will not be considered in the absence of the timely payment of the required Bid Fee. Payment instructions can also be viewed on the RFP Website Documents Page [e. Helpful Information]. The amount of the Bid Fee for this bid was calculated on the final page of the Bid Form on the IA website. If you did not submit the Bid Fee at the same time as this bid, the IE will accept bid fees until 5:00 PM on the RFP bid due date.

...

https://gpcrenew19.accionpower.com
Logged: 7/8/2020 12:02:18 PM
Template ID: 238

Another email reminder was sent to all Bidders two (2) days prior to the Bid due date, and additionally, another reminder was sent on the day before Bids were due:

From: gpcrenew@acciongroup.com
To: [Bidder]
Subject: GPC 2022/2023 - Upcoming Bid Close

The GPC 2022/2023 Bid period is scheduled to close in 24 hours on 7/15/2020 12:00:00 PM EPT

Bidders should allow at least 3 hours to complete the Bid Form after assembly of required documents for upload as well as all required information.

PLEASE NOTE: Bid Fees must be submitted electronically by Wire Transfer or ACH and must be received by 12:00 PM EPT on the RFP bid due date posted on the RFP Website. Your bid will not be considered in the absence of the timely payment of the required Bid Fee. Payment instructions can also be viewed on the RFP Website Documents Page [e. Helpful Information]. The amount of the Bid Fee for this bid was calculated on the final page of the Bid Form on the IA website. If you did not submit the Bid Fee at the same time as this bid, the IE will accept bid fees until 5:00 PM on the RFP bid due date.

...

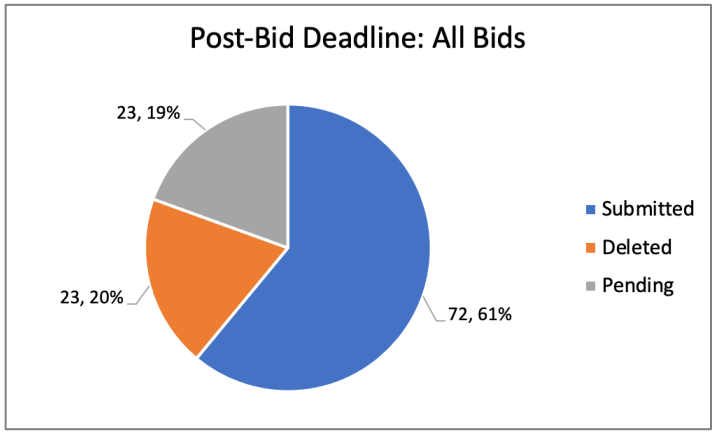
https://gpcrenew19.accionpower.com
Logged: 7/13/2020 12:02:21 PM
Template ID: 203

Each of the reminder notices also included bank information for the submittal of Bid Fees.

Following the Bid deadline, there were a total of 72 Bids submitted by 26 Bidders. The greatest number of Bids submitted by a single Bidder was seven (7), and the average (median) number of Bids submitted per Bidder was two (2).

In addition to the Bids submitted, there were 46 that were not submitted for two reasons. One reason was that a Bidder did complete the Bid Forms, but did not submit the Bid and therefore, their un-submitted Bids remained incomplete or "pending" once the Bid deadline passed. The other reason was that a Bidder chose not to continue using the Bid Form and subsequently deleted Bid(s). Figure 11 identifies the status of all Bids on the RFP Website.

Figure 11



VIII. BID DETAILS

A. BIDDERS' EVALUATION FEES ("Bid Fees")

To help defray costs of the evaluation of Bids, a Bid Fee was required of each Bidder for each bid submitted for consideration in the RFP. As defined in the RFP:

> *"**Bid Fee**" means the non-refundable fee a bidder is required to submit with each bid to defray costs of performing an evaluation of each bid.*

Each Bidder was required to submit with each Bid, a non-refundable minimum Bid Fee of five thousand dollars ($5,000) or three hundred dollars ($300) per MW ($300/MW), whichever was greater. The first one thousand dollars ($1,000) of each Bid Fee was used to defray a portion of the IE cost. Bid Fees were paid electronically following the instructions provided on the IE Website.

> *A bidder must pay the Bid Fee to the IE following the instructions provided on the IE Website. Payment is due at the time of bid submission and must be received no later than 12:00 PM (noon) EPT on the bid due date. Failure to timely submit the required fee on the due date is grounds for automatic disqualification.* [12]

(From: **RFP Section III.F2c.d.e)**

The RFP allowed Bidders the option to submit multiple Bids for one Bid Fee. The options and details were clearly identified and explained in the RFP Final Documents as *Multiple Bid Submissions*, *Unique Bids* and *Pricing Alternatives*.

a. Multiple Bid Submissions.

A bidder could submit multiple bids in response to this RFP. A bidder proposing multiple bids was required to clearly state in its proposals if the proposals were dependent upon each other. The example used was that if a bidder submitted multiple bids for several Sites but was only willing to develop a limited number of those facilities or required a combination of the bids to be selected together, or some of the bids were mutually exclusive, those contingencies and

[12] Final Approved 2022/2023 Utility Scale Renewable RFP, June 19, 2020. Section III.F.4.

limitations had to be stated clearly. All such contingencies had to be made known at the time of bid submission. A bidder could not aggregate multiple facilities from one or more Sites to meet the minimum MW required to be submitted in this RFP.

b. ***Unique Bids***. Each bid had to be unique with respect to the PPA Term, Facility location, size, POI, Southern Transmission Interface (if applicable), and any characteristics that would alter the amount or timing of the delivery of Renewable Energy from the Facility (*e.g.*, tracking capability and panel orientation for solar resources, Storage Use). For the purpose of Bid Fees, bids identical in all respects, but otherwise offering differing PPA Term lengths, were considered a single bid. Bids had to specify if the proposal was dependent on another bid submitted in response to this or another RFP.

For the purpose of Bid Fees, Bids offering differing PPA Term lengths, but identical in all respects, were considered a single Bid. The IE believes this was appropriate, and that when there were changes to the characteristics of a Bid, such as location, number of MWs or technology, a separate Bid Fee was required.

c. ***Pricing Alternatives***. For each bid submitted, a bidder was permitted to provide up to two pricing alternatives: (1) a fixed price for the selected Term (*e.g.*, fifteen (15), twenty (20), twenty-five (25) or thirty (30) Annual Periods), and (2) a schedule of annual prices for each Annual Period. Georgia Power considered a bid proposing two pricing alternatives as one bid with only one Bid Fee.

Additionally, the RFP clearly noted that if a bidder submitted a proposal that included a Storage Device, when calculating the Bid Fee, they also had to include the capacity (MW). For a DC-connected Storage Device, the AC equivalent capability of the Storage Device would be used. The following example was provided for calculating the Bid Fee when a Storage Device was included:

*[Bid Fee = Total MW [Renewable Resource (peak AC output) + Storage Device (peak AC output)] * $300]* [13]

Details about Bid Fees are provided in Confidential Appendix B.

Without a Bid Fee, ratepayers would be charged the entire cost of conducting the RFP, including the cost of personnel to review all Bids, regardless of the quality of each Bid. Additionally, without a Bid Fee there would have been no incentive for a Bidder to limit Bids to their best offers, and every incentive to file Bids that were redundant, except for small variations. The IE believes the Bid Fee was both reasonable and equally applied.

B. BID BONDS

Any Bidder with a Bid selected for the Competitive Tier was required to post a bond ("Bid Bond") within fifteen (15) Business Days. This requirement was newly introduced in the previous REDI Utility Scale Solicitation and was additionally implemented for this solicitation. The IE believes it was a successful tool in having only serious Bids considered as part of the Competitive Tier. Bidders could decline to post a Bid Bond, and have the associated Bid removed from consideration, but once the Bid Bond was posted, Bidders were committed to keep their Bid(s) available through the final evaluation, and if selected for contracted, were committed to execute a PPA or forfeit

[13] Final Approved 2022/2023 Utility Scale Renewable RFP, June 19, 2020. Section III.F.4.

the bond. This tool was a valuable tool in the effort to ensure that the entire portfolio was filled in accordance with the Solicitation Schedule, and to establish that only committed Bids would be part of the final evaluation.

The Bid Bond had to be posted within 15 Business Days in the form of:

- Cash Bid Bonds were submitted to Georgia Power through the IE Website according to the instructions posted on the Documents Page;
- Surety Bonds issued by a Person having a general long-term senior unsecured debt rating of A minus or higher as rated by S&P, or A3 or higher as rated by Moody's, or A minus or higher as rated by Fitch, or a Person rated at least A- by AM Best, if rated by AM; or
- Letter of Credit, equal to the product of one percent (1%) multiplied by the sum of the expected revenues during the Term of the PPA.

Each Bidder with a Bid selected for the Competitive Tier that intended to provide a Bid Bond in the form of a Surety Bond or a Letter of Credit was required to upload to its bid book a draft (unissued) Surety Bond or Letter of Credit for review and approval by the Evaluation Team, at least five (5) Business Days before the Bid Bond due date. An acceptable Surety Bond Form was available on the IE Website, along with instructions for posting the draft and final Bid Bond.

The Bid Bond was fully refundable to the Bidder if such Bid was placed on the Release List, or on the date Seller and Georgia Power executed the PPA for such winning Bid. If the Bid Bond was in the form of cash or a Letter of Credit, the Bidder could opt to convert the Bid Bond to the required Performance Security at the time of PPA execution. Alternatively, the Bidder could replace the Bid Bond with another acceptable form of Performance Security pursuant to the provisions of the PPA. The Bid Bond was non-refundable if a Bidder withdrew its Bid or otherwise failed to execute the pro-forma PPA after being selected for the Competitive Tier. No Bidder forfeited the Bid Bond instead of remaining in the process through completion.

This process worked well to have only serious Bidders proceed through the evaluation process and succeeded in having any Bidder fail to execute a proffered PPA. Pursuant to the RFP, Performance Security was calculated as a percentage of the total revenue during the term of the PPA (See: RFP Section II(B)(8)) and each Bidder offered a PPA was advised of the security to be provided. Shortly before the deadline for posting Performance Security, one Bidder identified an error in the calculation, which caused the GPC Evaluation Team to recalculate the Performance Security for all Bidders. The error was due to calculating the security based on calendar years rather than contract years. The original calculation applied the wrong price for December of the first year of the contract period. Once corrected, the Performance Security for all finalists was reduced by a small amount.

This recalculation resulted in an extension of the deadline for Performance Security, and one Bidder had difficulty processing a performance bond within the extended period. Ultimately, that Bidder provided a cash deposit as security, which was released by the IE once an executed Performance Security Bond was delivered. The IE and Staff agreed to the extension for the Bidder but were prepared to eliminate the Bid rather than delay the completion of the RFP in time for GPC to meet the Commission's filing requirements.

IX. EVALUATION PROCESS

A. OVERVIEW

RFP Bid Fees were due on July 15, 2020. Prior to this Bid date and as done in previous renewable RFPs, the IE worked with the Company and the Staff to review the Evaluation Methodology and lock down the Model used in the Evaluation. The RFP laid out the Evaluation Methodology in detail in Section H and Appendix C which provided Bidders the appropriate information surrounding the quantitative portion of the evaluation to put forth competitive offers. Within the Appendix, the Company signaled when energy was the most valuable to customers by providing a heat map by month and hour of day. As discussed in the RFP, each offer would be initially ranked by total net benefit to develop a Competitive Tier Ranking that would allow only the top offers to be moved forward to the Transmission Evaluation. During this Competitive Tier Ranking process, the Company was not provided Bidder information to ensure there was no bias towards any Bidder.

Bidders could include multiple PPA pricing options including fixed or escalating pricing, however, levelized pricing or pricing with lower than 3% escalation would trigger an additional front load performance security as noted in the RFP guidelines. Offers that de-escalated in price were considered non-conforming. Bidders were allowed to bid projects greater than 3 MW (AC) provided the project would have a Commercial Operation Date (COD) in 2022 or 2023. Bidders had the opportunity to propose 15-year, 20-year, 25-year, or 30-year contract terms. No self-build projects were proposed by Georgia Power, but the Company did accept turnkey proposals. All offers had to conform to the RFP guidelines and complete the Bid Form on the IE Website which included but weren't limited to the following:

1. Acknowledgement of several items that demonstrate the bid meets requirements of the RFP and that bidder understands key provisions of the RFP.
2. Bidder Information:
    a. Legal name of contracting party, if known, and immediate upstream parent entity, if applicable.
    b. Qualifications:
        (i) Previous experience providing the proposed product
        (ii) Letter of interest or letters of commitment from potential financing or tax equity partners
    c. Indication if the company is formed for the sole purpose of the project and a summary of the proposed Facility's legal ownership structure.
3. Financial and credit information for the bidder and for the bidder's parent company (if applicable), including:
    a. Description of ownership and debt arrangements, including the expected percentage of debt and equity capital that the bidder has committed to secure
    b. Annual reports for the past three (3) years and any Form 10-K and 10-Q filings since the period covered in the last annual report. If these documents are not available, then audited financial statements for the last three (3) years will be accepted. All financial statements, annual reports, and other large documents may be referenced via a website address. If a bidder has not been in operation for three (3) years, please provide the above information, as applicable, since the commencement of operation

c. Dunn and Bradstreet identification number
d. Credit rating of the bidder's senior debt securities
e. Details related to bidder's banking relationships or liquidity
f. Description of plans for acquiring the necessary funds for developing and operating the Facility, including a discussion of the Facility's legal ownership structure, the expected percentage of debt and equity capital that the bidder has committed to secure, and the identity and credit rating of firms that are likely to provide such financing
g. Any additional documentation needed to determine the bidder's financial strength and the strength of any corporate parents

4. A detailed description of any security/credit instruments proposed by the bidder to back its performance obligation. An acceptable Letter of Credit or Guaranty must include the provisions set forth in **Appendix B** and **Appendix C** of the pro forma PPAs
5. Statement that the PPA will not require deconsolidation with Georgia Power as the Primary Beneficiary by the Seller with respect to Variable Interest Entity
6. Statement indicating whether the Renewable Energy has been offered in another RFP or is otherwise obligated to another party and, if so, how it would be released to serve this proposed sale.
7. A map indicating the Facility location and known or proposed interconnection to the Transmission System. All known descriptions, drawings or details are beneficial in the evaluation of bids
8. A thorough description of anticipated environmental impact and compliance
9. For a new Facility, a construction schedule with all major activities from award of contract to Commercial Operation
10. Status of Interconnection Agreement:

    a. Detailed description of the interconnection arrangements that have been or will be made to deliver the Energy to Georgia Power or the STT and how any identified costs are included in the bid
    b. If an Interconnection Agreement is not in place, describe the status of the negotiations for such agreement
    c. Indicate the current status regarding property rights for the necessary Interconnection Facilities, including access rights for the Interconnection Provider throughout the PPA Term and any property rights and permits needed between the Facility Site and the Interconnection Provider's facilities

11. Any limitations on the use or availability of the Renewable Energy
12. An ongoing operation and maintenance plan for the Facility. For a bid including a Facility with a Storage Device, the intended long-term plan associated with the Storage Device, including any necessary replacement or upgrade plans to ensure the long-term storage capability for the term of the PPA.
13. Any proposed changes to the pro forma PPA(s) to reflect the product (Facility or resource type) in the form of a red-line mark-up and a list summarizing the proposed changes with the rationale for each change
14. Pricing proposal(s) – provide all that apply
15. Term of proposal. (15, 20, 25, or 30 Annual Periods)
16. Facility information, including (but not limited to):

    a. Name
    b. Location

c. Generating Capacity
d. Site Plan
e. Site Control Affidavit
f. Specific technical information (*i.e*. number of panels, generators, turbine information, spec sheets, manufacturer, maintenance schedules, etc.)
g. For a bid including a Facility with a Storage Device, the bidder must identify the intended Storage Use of the Storage Device (*i.e.*, Smoothing, Firming, Firming and Smoothing, Scheduled)
h. Appropriate technical information associated with a Storage Device, if any, including capacity and energy storage specifications, cycling efficiency, warranty requirements, limitations of use, cold weather conditioning plans, control schemes, device configuration (AC coupled, DC coupled, etc.), and whether the inverters are one directional (AC-DC only) or bi-directional (AC-DC and DC-AC), and the total output of the Facility including any simultaneous discharge of the Storage Device, as more fully described in Section II(B)(11) (*Energy Storage*).
i. Delivery Schedule

17. Performance data:

a. Maximum Capability (MW AC & MW DC) (including any Renewable Resource and Storage Device)
b. Annual Degradation after the first Annual Period
c. Profile for each Annual Period (include any degradation during each Annual Period) over the Term, in Excel format. Any Profile submitted by bidder must assume hour 0 is Energy delivered from midnight to 1:00AM EST. A bidder must provide the full Energy production from the Facility. If a Storage Device is included in the bid, the bidder must provide, at least, the following Profiles: (i) one with the Storage Device, and (ii) if proposing a Scheduled Storage Use, Forecasted Direct Daily Energy profile and Forecasted Indirect Daily Energy profile, and in all cases, respecting the Interconnection Limit; provided, however, in the case of the Profile for the Forecasted Indirect Daily Energy, the Interconnection Limit may be exceeded
d. Specifications of what was used to produce the Profile (Summarize model assumptions, weather assumptions, key inputs and methodology)
e. For Scheduled Storage Use bids, a bidder must provide the Storage Loss Factor

18. Interconnection Data:

a. Single line diagram to Point of Interconnection
b. Narrative of current path or plan for Interconnection to the Transmission System
c. Impedances, Short Circuit currents, etc.
d. Generator Interconnection Tie Line Data
e. GSU/Main Transformer Data
f. kV at the Point of Interconnection
g. Estimated/Assumed Interconnection Costs to Point of Interconnection
h. Detailed description of the interconnection arrangements, including projected timelines for Interconnection Study processes and the construction of Interconnection Facilities

B. NET BENEFIT

As outlined by the RFP, each Bid submitted was evaluated and ranked based on the net present value benefits to Georgia Power's customers on a dollar per megawatt hour ($/MWh) basis. The net benefit was calculated by totaling the total benefit of the project to customers and subtracting the costs customers will pay for the project.

C. TOTAL BENEFITS

The total benefit included Avoided Capacity Costs, Avoided Energy Costs, and the impact of the Renewable Cost Benefit ("RCB") Framework of the Bid. The RCB framework as discussed more fully in Georgia Power Company's 2019 Integrated Resource Plan in Docket No. 42310 was used and is made up of a Generator Remix, Support Capacity, and Deferred Transmission component. The Evaluation Model takes into account differences in projects with and without onsite storage.

D. TOTAL CUSTOMER COSTS

The costs included the total costs Georgia Power customers would pay for the Bid. This included the energy costs included in the PPAs as well as any costs associated with interconnecting the project or making grid improvements to accommodate the delivery of the energy to its customers.

E. STORAGE

Combined renewable and storage projects were allowed to bid but were designated as either smoothing, firming, firming and smoothing, or scheduled as defined below. Bidders who were including storage were required to provide hourly generation profiles before and after the storage was added.

1. Smoothing: to eliminate or dampen intra-hour variations in the Energy output of the Facility. Schedule is not guaranteed Day-ahead, but moment-to-moment variations are minimized.
2. Firming: used to firm up and guarantee the daily profile provided on a Day-ahead basis, also minimizing moment-to-moment variations.
3. Firming and Smoothing: used to shift Energy so it is delivered to the POI in more valuable hours. The Bidder must specify whether Seller under the PPA will choose the hours of discharge or whether Georgia Power will choose the hours of discharge and, if so, how frequently such designation may be changed (daily, monthly, seasonally, annually). Bidder must indicate whether Shifting Storage Use will increase the total capacity of the Facility.
4. Scheduled: Used to comply with Georgia Power's Day-ahead firm Energy delivery schedule. This Storage Use will also require the Storage Device to perform like a Smoothing Storage Use in order to smooth the moment-to-moment variations.

Further, the RCB support capacity credit was given to each storage type based on the following:

1. For Smoothing Storage Use, if the Storage Device is at least ten percent (10%) of the nominal Renewable Resource facility size in peak output (kW/MW) with an energy storage capability of thirty (30) minutes times ten percent (10%) of the nominal facility size or more (in kWh or MWh), the regulating reserve

component of support capacity (as defined in the RCB Framework) will be credited to the bid for evaluation purposes.

2. For Firming Storage Use, if the Storage Device is at least ten percent (10%) of the nominal Renewable Resource facility size in peak output (kW/MW) with an energy storage capability of four (4) hours times ten percent (10%) of the nominal facility size or more (in kWh or MWh), the forecast error component of support capacity (as defined in the RCB Framework) will be credited to the bid for evaluation purposes.
3. For Firming and Smoothing Storage Use, if the Storage Device is at least ten percent (10%) of the nominal Renewable Resource facility size in peak output (kW/MW) with an energy storage capability of four (4) times ten percent (10%) of the nominal facility size or more (in kWh or MWh), the forecast error and regulating reserve components of support capacity (as defined in the RCB Framework) will be credited to the bid for evaluation purposes.
4. For Scheduled Storage Use, if the Storage Device is at least fifty percent (50%) of the nominal Renewable Resource facility size in peak output (kW/MW) with an energy storage capability of four (4) hours times fifty percent (50%) of the nominal facility size or more (in kWh or MWh) the forecast error and regulating components of support capacity (as defined in the RCB Framework) will be credited to the bid for evaluation purposes. Any benefits associated with the ability of the Storage Device to shift energy will be calculated based on the Forecasted Direct Daily Energy profile, the Forecasted Indirect Daily Energy profile, the Maximum Storage Amount, the Storage Loss Factor and the Interconnection Limit submitted with the bid.

F. MOCK BIDS

A mock Bid evaluation was performed on the locked down Model before Bids were due to ensure results from the model were intuitive. The mock Bids included a wide range of project sizes and technologies to provide a full test of all the Model's attributes. As part of the mock bid process, the renewable evaluation model was provided which included the latest updates in regard to the RCB framework, system lambdas, capacity worth table, marginal CT costs, and expansion loss factors. The IE and the Company both evaluated the mock Bid offers to assure the Model was working correctly and that both parties were calculating the same net benefit calculations for each offer.

G. COMPETITIVE TIER

Once Bids were received, the IE worked closely with the Company to provide the required inputs needed for the Competitive Tier Evaluation. As part of this process, there were clarifying questions and cures for specific offers. The IE and Company provided Bidders opportunities to cure deficiencies in offers and the IE made sure all Bidders were treated fairly in this manner. The IE was required to play a major role in the communications of Offer cures due to the fact that Bidder names remained anonymous to the Company and the Company did have full access to the Bid books on the IE website. Once Bidders had the opportunity to cure, the evaluation analysis was conducted. The IE and Company ran the analysis in parallel and compared and reconciled any differences in the net benefit calculations. The Commission Staff also reviewed and performed its own analysis.

The Competitive tier was based on the evaluation of 95 PPA offers representing 72 unique projects, and 26 Bidders. The 72 unique projects represent a total of 11,320 unique MW. The resulting Competitive Tier that posted Bid Bond and would move forward to the Transmission Modeling included 39 offers representing 17 unique projects

across 11 Bidders. The 17 unique projects represented 2,971 MW. All offers were 30-year contracts located in the state of Georgia and 22 of the 39 offers included storage. The Company, IE, and Staff reviewed the evaluation and agreed on the Competitive Tier. Appendix A Table 1 shows the results of the Competitive Tier evaluation which excludes any additional transmission costs.

H. TRANSMISSION ANALYSIS

Eleven of the 50 offers did not post a Bid Bond which left 39 offers to move forward to Transmission Modeling. The Evaluation Team's transmission planning members evaluated the Bids in the Competitive Tier to determine the incremental costs the interconnection of the project brought to the transmission grid. This Transmission Evaluation is explained in detail in section X of this report.

I. COMPETITIVE TIER WITH TRANSMISSION COSTS ADDED

Once the revenue requirements for the network improvements were established the evaluation was performed again with the inclusion of the transmission cost adders. The results of the Competitive Tier with Transmission adders are included in Appendix A Table 2.

J. QUALITATIVE RANKING

Because all projects were located in Georgia and connected directly to the Georgia Power Transmission System or Georgia Power Distribution System and there were not distinct differences in Bidder experience, the qualitative (non-price) component did not impact the final rankings. The Company also performed due diligence on the Competitive Tier offers to ensure there was no non-conformance to the RFP. As part of the due diligence, several offers were eliminated due to unresolved environmental issues.

K. PORTFOLIO ANALYSIS AND FINAL SHORT LIST

After the Competitive Tier was reranked with the transmission impact included by individual offer, additional portfolio analysis was conducted on the top ranked offers. The portfolios were developed to target approximately 1,000 MW requested in the solicitation using the top ranked offers as shown in Appendix A Table 3. Additional transmission analysis was conducted to determine any interdependencies between the Bids and provide the most optimal portfolio. From this analysis a Final Short list was developed. The final short list and reserve list is included in Appendix A Table 4 which resulted in five projects being short listed from three different bidders. Four of the projects included storage with a smoothing use. An additional 4 projects were included on the Reserve List in case any of the short list bids could not meet requirements. Based on all the analysis performed on the offers, the IE confirms the Company's final short list as represented in Appendix A Table 4. The Commission Staff also reviewed the final portfolio analysis agreed on the Short List selections.

X. TRANSMISSION EVALUATION

The Evaluation Team's transmission planning members evaluated all of the Bids in the Competitive Tier to determine incremental costs that both interconnection of the project and transmission delivery brought to the transmission grid. Accion reviewed in detail the studies for each Bid and the costs allocated to each Bid.

A. TRANSMISSION ANALYSIS

Introduction and Summary

This transmission analysis approach has evolved over several procurements conducted by Georgia Power. Each time it has been used it evolves and improves. This evaluation continued the use of standard units and costs as a way to streamline analysis. After including costs from the transmission evaluation, the top ranked Bids were found to collectively add loading to the system that causes operating overloads. These overloads necessitated the creation of portfolios to further evaluate transmission interconnection costs in order to determine an optimal final short list. Finally, environmental issues needed to be addressed prior to proceeding with determining the short list.

The transmission cost analysis for each Bidder continued to be a most significant variable in the cost evaluation for each Bidder. The transmission cost analysis was further complicated by the presence of 29 Bids in the Competitive Tier. There were 17 unique Bid sites, each of which deserved a fair evaluation of the transmission costs that they would incur. Because of the large number of Bids, transmission evaluation needed to be efficient. The challenge was to produce a large number of transmission cost evaluations in a relatively short period of time while maintaining accuracy of evaluation and fair treatment of all Bidders.

B. FORMULATION OF TRANSMISSION EVALUATION APPROACH

As stated above, because of the large number of Bids that had to be quickly and fairly evaluated, an innovative approach to transmission cost determination had to be formulated. The normal approach upon receiving a request for interconnection would take about 90 days for the cost to be determined which includes site visits, determining specialized design and then estimating the interconnection costs based upon this specific analysis. Also, two (2) months would be spent completing delivery studies. Given the time requirements for completing the cost analysis for all of the Bids this normal approach was not feasible. The task at hand was to determine how the transmission cost analysis could be collapsed to meet the time requirement while preserving the accuracy of the results

Streamlined Transmission Evaluation Approach

The large number of Bids received and the relative short time available for the determination of interconnection and delivery costs for each Bid necessitated the normal system design and costing process to be significantly streamlined. Manpower resources were available to complete several Bid evaluations in parallel. Using resource availability, a resource plan was formed that completed the analysis requirements for the 29 bids in the Competitive Tier within the allotted analysis time period. This plan was created by transmission planning and reviewed by the IE. Several strategies were devised which when combined reduced the overall transmission cost estimation process to manageable terms. These strategies are listed below, subsequently discussed in the flowing sections.

- Bid Analysis Documentation Standards
- Standard Units and Costs
- Load Flow Analysis

1. Bid Analysis Documentation Standards

On previous generation acquisition projects in Georgia, the IE worked with Georgia Power to establish standards for the documentation of transmission analysis results. Each Bid was separately documented and showed:

- Study Purpose
- Bid Information
- Study Conclusions
    - Commercial Operating Date Risk
    - Earliest Feasible Commercial Operating Date
- Interconnection Configuration for the Proposed Bid
- Approximate interconnection location of the proposed Bid
- Study Structure and Assumptions
    - Unit out and area max scenarios
    - Load level scenarios
- Transmission System Impacts
    - Local area system impacts
    - Sensitivity scenarios – local area system impacts
    - Interface transfer capability impacts
    - Sensitivity scenarios – interface transfer capability impacts
    - Anti-islanding protection
    - FSAR impacts
    - Stability impacts
    - Weighted short-circuit ratio
    - Power quality impacts
    - Voltage deviation impacts
    - Grounding impacts
- Interconnection – Transmission Facilities
    - Estimated interconnection costs and construction times of improvements or modifications beyond the point of interconnection
- Transmission Delivery – Potential Solutions for Identified Constraints
    - Estimated transmission delivery costs and construction times of network improvements
    - Sensitivity scenarios – estimated transmission delivery costs risks and construction times of network improvements
    - Cost estimate for projects beyond the point of interconnection (utilizing standard cost units)

This is an expansion of the same documentation approach that was used in the previous transmission analysis process. The IE requested that a similar approach be used for this procurement as was used previously. The transmission planning team suggested the additional documentation topics, which were agreed to by the IE. An example of the standard analysis documentation for a bid is included as Trade Secret Exhibit A.

One of the additional topics was the sensitivity analysis. This was included because of the need to understand the potential impacts of adding projects in the transmission queue that are likely to move forward and that were planned by Georgia ITS members and other neighboring utilities. Exhibit B lists the eight projects and their

locations which were studied as potential system additions. All eight projects were discussed in the individual analysis for each bid that they impacted.

This documentation standard was used for all Bids for which transmission cost analysis was completed. In this way the estimated transmission costs for every Bid were presented in exactly the same way so that differences could be readily understood, and also so that all Bidders were treated similarly. An example of a completed standard analysis documentation report is included as TRADE SECRET Exhibit A. This particular bid was chosen for exhibit because it contains both additional cost risk and high commercial operating date timing risk.

2. Standard Costs and Units

Again, we looked to the lessons learned in the previous procurements. The most valuable time saver was the use of standard units and standard costs for those units. It was determined to use the same approach for this evaluation of transmission interconnection costs. Before costs and standards could be applied, they needed to be updated to reflect the cost changes and the unit changes that had occurred over the last year. The first update was to revisit the standards that were previously used and to determine if there were additions or deletions that would add precision to the standards.

After discussion between the IE and the Transmission Planning team, it was determined that the same 26 standards that had been used in the previous procurement had worked well and should be continued to be used. Following the determination to use the same standards, the historical cost data could be gathered for each of the standards.

A template had been previously developed as a tool to calculate (approximate) the cost for network upgrades. By using unit costs and estimating quantities, the interconnection and delivery costs can be quickly determined so as not to hold up the evaluation process. As an example, the template that was used is provided in TRADE SECRET - Exhibit A, which shows all of the units and shows the units that were selected for the interconnection of one (1) Bid. The last two pages of this exhibit show provide an example of standard unit selection and pricing. Each of the 29 completed documents contains the standard unit cost data for that individual bid.

3. Load flow Analysis

For each of the Competitive Tier Bids, a load flow analysis was performed to assess the transmission impacts of delivering the output of the proposed Bid to serve Southern Companies' native load. The load flow analysis was performed on multiple years, seasons, and system conditions which consisted of more than 3000 load flow cases being evaluated for each Bid. Contingency analysis was performed on each of these cases to determine if the loss of a single transmission element would then result in a constraint being identified as directly attributable to the output of the proposed Bid. As the result of this analysis, if a delivery related thermal constraint was identified, the appropriate standard unit cost was applied and ultimately attributed to the Bid being evaluated. The IE had specific questions about how the load flow model was utilized. The following information was prepared by Transmission Planning in response to those questions.

Transmission Evaluation Process

Overview

The transmission evaluation of individual bids was performed by Southern Company Services Transmission Planning and began after the initial Competitive Tier list was developed by SCS/GPC Resource Planning, excluding any transmission impacts. The transmission evaluation was completed in two phases: 1) an individual evaluation for each Bid independently and 2) a combination evaluation for the most economic group of Bids as a potential Short List portfolio. The transmission costs identified in the individual Bid evaluations were imputed to the respective Bids and used by Resource Planning to determine a revised Competitive Tier ranking that included transmission impacts. The most economic Bids from the revised Competitive Tier were then evaluated in the combination evaluation of potential Short List portfolios utilizing the same standard analyses from the individual evaluations as well as a few additional detailed scenarios and considerations.

Analysis Data for Each Bid

Starting with the most competitive bid, the transmission team obtained the necessary bid data from the bid books that were available on the IE website for this RFP. These bid books were available in the bid management section and the individual project information documents provided by the bidder were made available to the transmission team. These documents were downloaded for each bid prior to commencing the analysis for each bid.

Individual Transmission Evaluations

The individual transmission evaluations included the following standard analyses consistent with SCS Transmission Planning Criteria: local area thermal, interface, stability, system protection, anti-islanding, short circuit, Nuclear Offsite Power impact, and interconnection configuration. Any associated transmission improvements required from these analyses were estimated for cost and timing utilizing a consistent set of standard cost units. From a logistics perspective, individual Bids were evaluated in sets of three Bids, beginning with the three highest ranked Bids, with each study owner being responsible for one individual Bid. The study owner performed the local area thermal analysis and coordinated with the other transmission evaluation team members on the remaining analyses, estimates, and reviews. The general evaluation steps are outlined below:

Individual Bid Evaluation Steps

1. Scope upcoming set of Bids with the transmission evaluation team prior to analyses and determine the following in order to build individual Bid evaluation “ON cases” (Consistent set of OFF cases already built):
    a. Which standard Utility Scale RFP unit out and area max cases are relevant to the Bid location
    b. Any proxy generation near the Bid sites that needs to be removed
    c. Bid interconnection configuration for modeling
2. Perform local area thermal analysis and review results with Georgia local area planners to verify all results and required improvements.
3. Collect results from all other associated groups (e.g. stability, system protection, FSAR, short circuit, interface analyses, etc.).
4. Create draft report with required improvements and review with transmission evaluation team.
5. GPC estimating group applies standard cost units and lead-time to all required improvements.

6. Final report including costs and timing are reviewed by transmission evaluation team and finalized.

Combination Transmission Evaluations

After the Competitive Tier was reranked based on the individual evaluation transmission costs, the combination of Bids making up of the most economic potential Short List group up to the approximate solicitation amount, were selected as a combination portfolio. Three such portfolios were created to represent the three most economic combinations of bids that would satisfy the procurement objectives. A transmission evaluation was performed one combination at a time and followed the same process outlined above until the most economic combination was determined. The same standard analyses types were utilized in the combination analyses, with the exception of the following additions described below: additional generator interconnection queue considerations, and grounding analysis.

Generator Interconnection Queue Considerations

By vast majority, the only generators that proceed from Southern Company's generator interconnection queue and actually materialize as constructed projects are those selected in an RFP solicitation. As such, other queued interconnection requests were not included in the individual Bid transmission evaluations as they would unnecessarily complicate the analysis and cost with unrealistic speculative projects. However, in the combination evaluations, any prior-queued interconnection requests that were in close proximity to the Bid and had any likelihood of moving forward were reviewed for the possibility of causing additional transmission constraints. If any incremental transmission improvements may have been required due to the addition of these prior-queued request, those costs would be included in an additional "cost risk" column in the combination Bid transmission evaluation.

Grounding

Historically, grounding grid improvements have not driven significant transmission costs in the RFP evaluations and therefore this analysis is only included in the final combination evaluations.

C. APPLICATION OF TRANSMISSION EVALUATION APPROACH

After the plan for evaluation approach was finalized. The transmission cost to be assigned to each Bid was in place the next step was to begin to apply that plan to actual Bids. That application was accomplished in several steps, which were:

- Determine which Bids to evaluate
- Understanding of transmission Bid data
- Verification of transmission costs

1. Determine Which Bids to Evaluate

After all of the Bids were received for this Utility Scale procurement, an economic analysis was performed so that the Bids could be initially ranked based off of total net benefit. Transmission Evaluation Team received the ranked Bids and began to complete the analysis starting at the top of the list which had the highest net benefit. Some bids were identical but for their contract period, while others were mutually exclusive meaning only the highest ranked of the Bids moved forward. The final result was that there were 29 Bids (17 unique sites) in the Competitive Tier. Each of these Bids was analyzed with a standard analysis document prepared for each Bid.

2. Understanding of Transmission Bid Data

After documentation standards were established, the Transmission Analysis for each of the selected Bids could be initiated. The approach used was first to understand all of the transmission Bid data that the Bidders provided. Starting with the most competitive bid, the transmission team obtained the necessary bid data from the bid books that were available on the IE website for this RFP. These bid books were available in the bid management section and the individual project information documents provided by the bidder were made available to the transmission team. These documents were downloaded for each bid prior to commencing the analysis for each bid.

As the bidder provided data is reviewed, questions often arise that require clarification by the Bidder. It was the role of the IE to gather the questions that need clarification from Transmission Analysis and post the proper questions for each Bidder on the IE Website.

The IE felt that it was important to be highly involved in the process of reviewing the analysis results as they became available. A review process was established so that as the individual Bid transmission analysis documents were completed in draft form they were sent to the IE. The IE reviewed each of these and asked clarification and content questions.

3. Verification of Transmission Costs

As the Bid evaluations were being completed, the IE began to verify the accuracy of the data, the costs used in the analysis and the results of the analysis. The IE directed the verification work, which was completed by the Evaluation Team This verification consisted of reviewing and validating:

- Review of basic system data
- Verification of Standard Costs
- Validation of Power flow Model
- Basis for Selection of Bids for Verification
- Cost Detail Analysis
- Cost Risk Analysis
- Thermal Loading Determination

4. Review of Basic System Data

Early in the process the IE reached out to the Evaluation Team to obtain updated system information. It had been less than a year since the IE had worked with the Transmission Planning department and been involved with the Southern Company transmission system. Over that period, there had not been significant facility changes and the procedures for transmission cost analysis had not substantially changed. As a result, the IE did not pursue a basis data and process check. In the previous REDI 2 procurement the following data was gathered and reviewed. It was felt that in that such a short time had passed since the REDI 2 procurement, that this data analysis was not necessary.

- Starting Point Power System Simulator for Engineers (“PSSE”) Cases
- Dynamics PSSE Cases
- Planning Guidelines
- Breaker Margin Reports
- Guidelines for RFP Native Load Resource Evaluations

- Area Max Scenarios for use in RFP transmission evaluations
- RFP Base case Set Up documentation

5. Verification of Standard Costs

As explained previously the use of standard unit costs was a method to help streamline the transmission evaluation process and to allow completion of the process within the required time frame. However, by using averaged costs for a standard list of construction units, less precision is introduced. The IE was interested in learning exactly how accurate or inaccurate the averaged costs were in relation to actual costs.

To test the accuracy of the standard costs that had been used, we calculated which units had the most impact on the final interconnection cost of the Bids. Trade Secret Exhibit C shows the total number of units applied and the total cost incurred. The table shows the standard unit cost impact on all 29 Bids in the Competitive Tier. The top units, which are highlighted in yellow text, were selected for verification. These units were:

- 230kV Protective relay panel
- 115 and 230 kV Interconnection substation (greenfield) 3 breaker ring
- 115 and 230 kV Transmission line rebuild on existing R/W

A data request was made to the Evaluation Team and GPC to provide actual completed cost data for recently completed projects that contain the five units determined to have high usage and high-cost impact.

Of the requested standard costs, all had completed jobs that provided valid comparisons with the standard unit costs. Trade Secret Exhibit D contains data which compares the actual system costs with the estimated standard unit costs for the selected activities.

The following observations are based upon the data drawn from the summaries that were developed during evaluation:

- The unit cost variances between the actual costs for the very recently completed project and the unit cost estimates for the 230 kV protective relay panel were divergent by 14%, which is outside of the 10% accuracy target. This small difference is not concerning because the actual cost is less than the estimate applied to the bid, thus insuring bid value.
- The actual cost for the two 115 kV interconnection substations was under the standard estimate by 10.9% and 13%.
- The actual cost for the first of the two 230 kV interconnection substations was under by 10 % and the second was under by 1%.
- The two 115kV transmission line rebuild on existing right of way verification comparisons resulted in a 9.3% and an 18% difference. Both of the actual costs were less than the standard unit costs.
- A single 230kV line rebuild on existing right of way verification resulted in an actual cost that was 1.8% higher than the standard cost estimate.

The result of this verification step is satisfaction with the accuracy of the streamlined transmission cost estimating process that was used to evaluate all of the selected Bids.

6. Validation of Power Flow Model

The basis for the transmission cost analysis was the power flow model. It represented the electrical system and calculated the impacts of adding each of the Utility Scale Competitive Tier projects. As such it was the basis for the system conditions that indicated what upgrades would be required to accommodate each of the 29 Competitive Tier projects. The IE asked for a description of the process used to calibrate this model and develop the base case so that the process would be better understood. This request led to the following document which was discussed and reviewed with the transmission team.

Power Flow Model Base Case Development

Overview

The Utility Scale base case power flow models were built starting from the standard 2020 Version 2 base cases created by Southern Company Services Transmission Planning, which were the latest available at the time of the evaluation. These models are consistent with what would be used in Southern Company's transmission planning process for Transmission Service and Area Planning evaluations during this period. Utility Scale OFF case models were built in order to determine the initial loadings on the transmission system prior to any Bid facility additions, and Utility Scale case models were then built with individual Bid facilities added in order to determine each Bid facility's impact on the transmission system by comparing the delta in loadings between the OFF and ON case analysis results.

OFF Case Models

In order to create the Utility Scale OFF case models, modifications were made to the Version 2 starting point models for the Utility Scale transmission evaluation for two purposes: 1) proxy generation was added to the cases in order to aid in isolating the transmission impacts to those caused by the addition of the Bid facility and 2) available transmission service information that was not already in the Version 2 models was added to the models. These modifications are described in detail below.

- Generic proxy generation totaling the solicitation amount of 1030 MW was added to the OFF case models. This proxy generation was evenly distributed among 20 sites across the Southern Company 500 kV and 230 kV system that were strategically chosen based on experience to minimize any transmission impacts. This proxy generation would later be used in the ON cases to offset or redispatch the additional generation for each Bid facility. Any proxy generators determined to be in close electrical proximity to a Bid facility were removed from the OFF cases for that particular evaluation, and the removed generation was redistributed among the remaining proxy generator sites.

- Additionally, relevant generation Designations confirmed by Southern Company after the release of the 2020 Version 2 models were included in the OFF cases. This included a newly confirmed site per OASIS #90741437.

ON Case Models

The Utility Scale ON case models were identical to the OFF case models except for the addition of each Bid facility. Each Bid evaluation had an individual set of ON case models that included the Bid facility modeled at its proposed Point of Interconnection ("POI") and generating at its maximum proposed capacity. In order to balance the system dispatch in the model for the Bid facility's additional generation, the proxy generation was evenly reduced across all 20 sites by the generating amount of the Bid facility. This use of proxy generation allowed the OFF and ON case models to have the same predictable system dispatch of generation without transmission impacts, such

that any change seen in the analysis between the OFF and ON case models was isolated to the Bid facility under study.

- The Utility Scale ON and OFF case models consisted of a standard set of no unit out, unit out, and area max cases distributed across the entire Southern Company footprint and consistent with typical SCS Transmission Planning and NERC TPL Standard analysis. Each Bid was reviewed prior to evaluation and was scoped to only included a subset of unit out and area max cases that were in close electrical proximity to that particular Bid.
- **Basis for Selection of Bids for Verification**

To select the best Bids for verification the IE examined data for the top ranked Bids. Based upon this data analysis two bids were selected for further verification, one because it was the lowest ranked bid and the other because it was the highest ranked bid that was not selected.

- **Transmission Analysis Document**

Included in the report exhibits is the complete analysis document which follows the format used for all 29 Bids in the Competitive Tier. This is included as exhibit A so that the standard document content can be understood and to provide a foundation for the cost detail, additional cost risk, commercial operating date risk, and thermal loading verification documents.

Cost Detail Analysis

The IE selected two (2) Bids for verification. Because the description of the verification discloses information about a specific Bid, the description of the verification is provided as Trade Secret Exhibit I. The Bid described in the Attachment was chosen because it was the lowest ranked bid that was selected for the shortlist.

Additional Cost Risk

Based upon the results of the cost analysis completed in previous GPC procurements, the transmission analysis team and the IE felt that it was appropriate to quantify the possible exposure that each bid had to additional costs. A three-point scale was formed to show low, moderate and high exposure to additional cost for each bid.

Commercial Operating Date Risk Analysis

One of the concerns that the IE had while evaluating these bids was whether there was any significant likelihood that the in-service date projected for each bid project that was evaluated in the competitive tier could not be met. The IE asked the transmission analysis team to ascertain whether the risk of not meeting the in-service date was either:

- Low
- Low moderate
- High moderate
- High

The bid selected to be shown as Exhibit A includes detail of the additional cost and date risk analysis.

Thermal Loading Verification

A further verification of the transmission costs allocated to each Bid was to examine the thermal loading on the lines impacted by the connection of each of the four selected projects. The IE requested the thermal loading results for one of the bids selected for verification, which is shown below.

Top Three responses with Loadings greater than 85%

Scenario	Variation	Rating (MVA)	2024	2025	2026	2027	2028	2029	2030
GPCRenewRFP2223	OFF	124	82.4%	82.3%	82.2%	80.1%	80.0%	81.0%	80.2%
	ON		96.5%	96.3%	96.4%	94.3%	94.2%	95.0%	94.5%
	Delta		14.1%	14.0%	14.2%	14.2%	14.2%	14.0%	14.3%
GPCRenewRFP2223	OFF	104	92.8%	91.8%	91.5%	89.5%	88.6%	88.3%	88.0%
	ON		96.0%	95.1%	94.7%	92.7%	91.8%	91.6%	91.3%
	Delta		3.2%	3.3%	3.2%	3.2%	3.2%	3.3%	3.3%
GPCRenewRFP2223	OFF	124	93.6%	92.7%	91.9%	91.0%	90.4%	90.1%	89.4%
	ON		96.3%	95.4%	94.5%	93.6%	93.0%	92.8%	92.1%
	Delta		2.7%	2.7%	2.6%	2.6%	2.6%	2.7%	2.7%

The results shown in this table show all of the line loadings through year 2030 and none exceed 100%.

Understanding Overall Analysis Results

Each of the 29 Bids that were evaluated for transmission costs had results documented using the standard form. An example of this documentation for one of the top Bids is included as Trade Secret Exhibit A.

The basic interconnection cost for each Bid was established including costs for any required interconnection substation, protective relaying, power line carrier and transmission line connection. If a Bid contained higher transmission costs it was significantly disadvantaged.

Additional details on the transmission impact on the evaluation process is included in the Trade Secret Exhibit E.

D. COMPLETION OF SPECIALIZED ANALYSIS

There were three areas where specialized analysis was needed:

- Portfolio formulation and evaluation
- Prior-queued impacts - MEAG Project Status, including any nearby prior-queued facilities.
- Environmental concerns

1. Portfolio Analysis Determination

As analysis produces the final cost rankings, there is a need to understand which group of projects can best be combined to produce the 1030 megawatts which is the target of this procurement. This portfolio analysis assesses the aggregate impact of adding theses megawatts to the Southern Company system. Three portfolios were created

from the top ranked individual bids. The objective was to determine which portfolio of Bids would deliver the lowest cost package.

Portfolio I was created using the top five ranked Bids, which totaled 970 MW. Portfolio II (with a total of 971 MWs) and Portfolio III (with a total of 995.5 MWs) were designed to meet the RFP goals, in the event the best ranked Bid failed. Each of these portfolios was analyzed as an aggregated addition to the 2020 V2 base case. The resulting portfolio analysis for the top ranked Portfolio F is included as Trade Secret Exhibit F. The aggregated analysis of Portfolio I indicated that during rare off-peak conditions two transmission lines could become overloaded. An operating work around was devised to resolve these overloaded lines.

The IE became concerned as to whether it was appropriate to resolve as system deficiency with an operating solution. As a result, a memo shown in Trade Secret Exhibit H was written and posted on the IE website.

2. Prior-Queued Facility Impacts

The transmission evaluation team reviewed, in the development of the final portfolios potential impacts based on any additional prior-queued facilities in the area not previously considered. In this review, they identified and questioned whether a particular request by MEAG for transmission delivery service facility would in fact be built because it held a prior queued position to transmission capacity in the delivery queues that could impact multiple bids. Georgia Power reached out to MEAG and inquired as to the status of the particular facility utilizing standard procedures and without disclosing Bid information. They were informed that the project was included in the MEAG resource plan and was committed to move forward. Thus, transmission capacity needed to be reserved for this prior queued project in the Bid evaluations. The transmission evaluation team included any additional costs in the individual bid analysis and utilized this additional information in the development of portfolios.

3. Environmental Concern

As the transmission cost analysis was being completed in the previous GPC procurement, a concern was identified that there were potential environmental issues with the portfolios. As a result, a more aggressive upfront environmental analysis approach was instituted which eliminated the environmental analysis issues.

E. INTERACTION WITH TRANSMISSION PLANNING

All of the transmission analysis necessary to provide interconnection and delivery costs for each of the Bids was completed by the Evaluation Team members from Transmission Planning using their existing models which had been calibrated to represent the Southern Company system. All of the work product was reviewed by the IE before it was sent to either the Commission Staff, posted to the IE Website or sent to the rest of the Evaluation Team. The verification approach was designed and directed by the IE, but the resulting additional analysis was completed by the Transmission Planning Evaluation Team members. The documentation standards were jointly developed between Transmission Planning and the IE, both making suggestions which enhanced the approach taken.

The IE and Evaluation Team Transmission Planning personnel communicated several times each week from early July 2020 into April of 2021. On approximately a weekly basis a formal discussion was planned with topics determined in advance by the IE. The topics were communicated to the Transmission Team in advance of the meeting so that they could be prepared. An example of the discussion topics for one of these sessions is included as TRADE SECRET-Exhibit G. This team call occurred late in the process and contains verification process steps.

The cooperation received by the IE was exceptional. Transmission planning was quite open to jointly finding the best way to achieve the necessary verification objectives and were most helpful in identifying the best approach. As previously stated in this report the analysis process was expanded to encompass additional analysis topics, the transmission team was completely responsible for producing this additional analysis in a timely manner.

The IE had the luxury of having two contact people from the Evaluation Team in Transmission Planning, both of whom were completely versed in transmission analysis process and the progress that was being made. This was particularly helpful when one individual was on vacation or out of town at an industry conference. The IE greatly appreciates the dedication of transmission planning that was required to complete this extensive analysis in a timely and accurate manner.

F. INTERACTION WITH BIDDERS

The IE often provided a buffer between Evaluation Team and the Bidders, including when there was need for additional information from bidders during the transmission assessment. This buffer was necessary to ensure that all post Bid submittal information was exchanged in an open manner. All such communications went through the IE and through the IE Website.

G. INTERACTION WITH COMMISSION STAFF

The Staff was highly involved in the transmission cost evaluation process. They were involved from the start and helped formulate the approach that would be used in this procurement. The IE and Staff talked and communicated by email on a regular basis. There was an open dialogue where the IE discussed plans and upcoming analysis and the Commission Staff provided feedback.

As work product and analysis results were produced by Evaluation Team members from Transmission Planning, they were first reviewed by the IE and then sent to the Commission Staff for their review and subsequent input. They provided input as to the analysis approach. They asked clarifying questions as the analysis approach was being applied, they also participated in status update sessions.

The IE enjoyed an open working relationship with the Staff, we were both working together to ensure that all transmission Bids received a fair cost evaluation.

XI. POST-EVALUATION DISCUSSIONS

A meeting was held with each of the Short List Bidders. The IE and Commission Staff attended each meeting and were full participants in the discussions. The purpose of each meeting was to confirm the ability and willingness of each Bidder to execute a PPA and to meet the terms and conditions. As noted above, no Bidder was permitted to re-price a Bid or otherwise alter the risk profile of the parties. The use of a non-negotiable proforma contract was clearly understood by each of the finalists and there were no attempts to make material changes to the standard PPA. Non-material clarifications were made in recognition of unique characteristics of individual projects.

The IE affirms that the post-evaluation discussions conformed to the RFP protocols, and that no Bidder was permitted to change the pricing of a Bid, or to increase the risk to GPC or GPC customers. The fact that Bidders embraced the process that prohibited post-evaluation negotiation of PPA terms validates the success of the Commission's approach and standards.

XII. CONCLUSION

In summary, the IE believes a fair solicitation was conducted, that all Bidders had access to the same information at the same time, and that all Bids were evaluated using the same criteria and standards. The use of Mock Bids confirmed that the evaluation model was mutually agreed upon. The response to the RFP was robust, resulting in a portfolio of renewable projects meeting the goals of GPC and the GPSC. The evaluation performed by GPC provided to be thorough and well documented. As with past solicitations, there was an open and cooperative exchange between the IE and the Evaluation Team and the IE confirmed the findings of the evaluation of each Bid.

The use of an approved pro-forma PPA was of significant value in preventing Bidders from presenting Bids with extremely attractive pricing in order to be selected as a finalist, with the goal of then attempting to extract increased value in the contracting phase. The IE, GPC Evaluation Team and the Staff adamantly and effectively required fidelity to the terms of the pro-forma PPA, which was respected by all finalists. The IE encourages GPC and the Commission to continue to rely on a pro-forma contract so that all Bidders understand they, and all other Bidders, are Bidding to the same terms and conditions.

The transmission evaluation approach continues to be tested and it continues to evolve during each subsequent procurement. Each of the 29 Bids in the Competitive Tier was analyzed for transmission interconnection costs using the same process. Documentation of this process is uniform for each of these Bids. The verification process successfully covered.

- Standard costs and their application
- Verification of Standard Costs
- Validation of Power flow Model
- Basis for Selection of Bids for Verification
- Cost Detail Analysis
- Cost Risk Analysis
- Thermal Loading Determination

This verification showed that the proper process was followed, and all Bidders were treated fairly and evenly. The transmission cost evaluation was accurately completed for each Bid even though the following complicating factors had to be successfully incorporated into the analysis.

- Prior-queued MEAG project status
- Environmental concerns
- Portfolio analysis

The IE was able to work in a cooperative manner with the Commission Staff and the Transmission analysis personnel on the Evaluation Team. There were open discussion concerning analysis methods, data requirements and results. Interim data and analysis results were shared and changes to analysis contents were made. The final transmission cost assessments produced results that treated all Bidders fairly using the same methods and calculations for each Bidder. The analysis methodology was successfully tested for completeness and accuracy. The IE finds that the approach taken was appropriate and treated all Bidders evenly and fairly.