STATE OF GEORGIA **GPC Ex. 28**

BEFORE THE

GEORGIA PUBLIC SERVICE COMMISSION

In Re:

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

DIRECT TESTIMONY OF

DR. ROSS BEPPLER, CARLEY GOFF, A. WILSON MALLARD,

AND ANDY PHILLIPS

FEBRUARY 28, 2025

DIRECT TESTIMONY OF
DR. ROSS BEPPLER, CARLEY GOFF, A. WILSON MALLARD,
AND ANDY PHILLIPS

IN SUPPORT OF GEORGIA POWER COMPANY'S

2025 INTEGRATED RESOURCE PLAN DOCKET NO. 56002

AND

APPLICATION FOR THE CERTIFICATION, DECERTIFICATION, AND AMENDED DEMAND SIDE MANAGEMENT PLAN
DOCKET NO. 56003

I. INTRODUCTION

Q. PLEASE STATE YOUR NAMES, TITLES, AND BUSINESS ADDRESSES.

A. My name is Dr. Ross Cannon Beppler. I am the Load Flexibility and Analysis Manager for Southern Company Services ("SCS"). My business address is 241 Ralph McGill Boulevard, N.E., Atlanta, Georgia 30308.

A. My name is Carley Jones McCloskey Goff. I am the Director of Demand Planning and Analysis for SCS. My business address is 241 Ralph McGill Boulevard, N.E., Atlanta, Georgia 30308.

A. My name is Andrew Wilson Mallard. I am the Director of Renewable Development for Georgia Power Company ("Georgia Power" or the "Company"). My business address is 241 Ralph McGill Boulevard, N.E., Atlanta, Georgia 30308.

A. My name is Richard Anthony ("Andy") Phillips. I am the Profitability and Economic Analysis Manager for SCS. My business address is 241 Ralph McGill Boulevard, N.E., Atlanta, Georgia 30308.

Q. DR. BEPPLER, PLEASE SUMMARIZE YOUR EDUCATION AND PROFESSIONAL EXPERIENCE.

A. I began my academic studies at Clemson University, earning a Bachelor of Science in Electrical Engineering in 2014. Following this, I pursued a PhD in Energy and Environmental Policy from the Georgia Institute of Technology, which I completed in 2019. During my doctoral studies, I gained experience interning at the National Renewable Energy Laboratory, and at the Georgia Public Service Commission ("Commission"). From March 2018 to December 2019, I worked as a Quantitative Analyst with Demand Side Analytics, where I focused on data-driven insights on demand-side programs and technologies.

In 2019, I joined SCS as an analyst in the Planning and Regulatory Support organization. In 2022, I advanced to the role of Demand Analysis Manager. As of January 2024, I serve as the Load Flexibility and Analysis Manager, where I am responsible for design and evaluation of load flexibility programs and complimentary economic analysis.

Q. DR. BEPPLER, HAVE YOU PREVIOUSLY TESTIFIED BEFORE THE COMMISSION?

A. No.

Q. MS. GOFF, PLEASE SUMMARIZE YOUR EDUCATION AND PROFESSIONAL EXPERIENCE.

A. I began my career in the energy sector after earning a Bachelor of Science in Finance from the University of Georgia in 2005. Shortly thereafter, I joined SCS as a Financial Analyst, where I worked from 2005 to 2007. In 2007, I transitioned to

Georgia Power, serving as a Profitability and Economic Analyst while pursuing my MBA from Emory University, which I completed in 2010.

Following my MBA, I continued at Georgia Power as a Financial Analyst from 2010 to 2012. I then advanced to the role of Metro East Region Financial Comptroller, a position I held until 2014. My career path then led me to become the Sales Manager for Outdoor Lighting from 2014 to 2015, followed by my role as Resource Management and Budget Manager from 2015 to 2018.

From 2018 to 2020, I served as the Assistant to the Executive Vice President, Chief Financial Officer, and Treasurer of Georgia Power. I then took on the role of Environmental Affairs Project Controls Manager from 2020 to 2024. Currently, I am the Director of Demand Planning and Analysis at Southern Company, a position I have held since April 2024.

Q. MS. GOFF, HAVE YOU PREVIOUSLY TESTIFIED BEFORE THE COMMISSION?

A. No.

Q. MR. MALLARD, PLEASE SUMMARIZE YOUR EDUCATION AND PROFESSIONAL EXPERIENCE.

A. I have a Bachelor of Arts degree in Geography from the University of Georgia and an MBA degree from Mercer University. I began my career with Georgia Power in 1997 and have held various positions in Retail Sales and Service, Pricing and Rates, Energy Efficiency, Renewable Development, and Marketing. I served as the first manager of the Company's Green Energy Program, and I helped create the Renewable Development organization in 2013. From 2013 until 2016, I was the Renewable Energy Planning Manager with primary responsibility for renewable energy strategy and program development for both Georgia Power's renewable energy procurement plans and customer solar programs. I managed and oversaw the team responsible for all aspects of analysis, compliance, reporting, and

communication related to the Company's renewable energy initiatives. Immediately prior to my current role, I served as Assistant to the Senior Vice President of Marketing for Georgia Power, where I provided oversight and assistance for all of Georgia Power's marketing, energy efficiency, energy services, sales, pricing, and planning activities.

Currently, I serve as the Director of Renewable Development for Georgia Power. In this role, I lead the development of renewable strategy and policy for Georgia Power Company, and am responsible for compliance in the administration of renewable programs and procurements.

Q. MR. MALLARD, HAVE YOU PREVIOUSLY TESTIFIED BEFORE THE COMMISSION?

A. Yes. I testified in Docket No. 44160, Georgia Power Company's 2022 Integrated Resource Plan ("IRP"); Docket No. 43814, Georgia Power's Application for the Certification of the 2022/2023 Utility Scale Renewable Power Purchase Agreements ("PPAs"); Docket Nos. 4822, 16573, and 19279, the Commission's Review of Georgia Power's PURPA Avoided Cost Methodology; Docket No. 42625, Georgia Power's Application for the Certification of the 2020/2021 REDI Utility Scale PPAs; Docket No. 41596, Georgia Power's Application for the Certification of the 2018/2019 REDI Utility Scale PPAs; and Docket No. 41734, Georgia Power's Application for the Certification of the 2018/2019 REDI Utility Scale PPAs for the Commercial and Industrial ("C&I") Program.

Q. MR. PHILLIPS, PLEASE SUMMARIZE YOUR EDUCATION AND PROFESSIONAL EXPERIENCE.

A. I graduated in 1996 from the Georgia Institute of Technology with a Bachelor of Science degree in Electrical Engineering. I also attended Emory University's Goizueta Business School, where I graduated with a Master of Business Administration ("MBA") in 2002. I began my career at Georgia Power in 1991 as

part of the Co-Operative Education Program. Since 1997, I have held several roles with increasing responsibility in a variety of organizations including Distribution, Customer Service, Sales, and Planning and Pricing. I managed the Company's customer satisfaction programs from 2009 to 2012, served as a Key Accounts Team Manager from 2012 to 2017, and managed four teams within the Sales Organization as the Sales Support Manager from 2017 to 2018. In addition, I managed Georgia Power's electrical transportation programs while serving as the Electrification Manager from 2018 to 2019. I assumed my current role as the Profitability & Economic Analysis Manager in 2019, where I am responsible for leading the economic analysis in support of Georgia Power's energy efficiency programs.

Q. MR. PHILLIPS, HAVE YOU PREVIOUSLY TESTIFIED BEFORE THE COMMISSION?

A. Yes. I testified in Docket No. 44160, Georgia Power Company's 2022 IRP.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. Our testimony supports the Company's 2025 IRP and 2025 Application for the Certification, Decertification and Amended Demand Side Management Plan ("DSM Application") filed on January 31, 2025. We adopt the 2025 IRP and DSM Application as part of our testimony.

Q. PLEASE SUMMARIZE THE TESTIMONY OF THE PANEL.

A. The Company's Demand Side Management ("DSM") plan was developed in accordance with the Commission-approved DSM Program Planning Approach, per Commission orders, and in collaboration with the DSM Working Group ("DSMWG"). The Company developed four DSM cases in this case: the Proposed Case, the DSMWG Advocacy Case, the Supply-Side Case, and the Capacity and Affordability Case. The Company supports the adoption of the Proposed Case, which includes a DSM savings target of at least 0.75% of annual retail sales as required by the Commission's Order Adopting Stipulation in the Vogtle Prudency

Proceeding in Docket No. 29849 ("Vogtle Prudence Order"). Each of the other three cases were developed to evaluate the potential for varying levels of DSM investment and their impacts. The Company evaluated the cost effectiveness of these cases considering the impacts of the 111 Greenhouse Gas ("GHG") Rules by analyzing the economics within the moderate-gas, lower carbon pressure ("MG0") and moderate gas, zero-dollar carbon with 111 GHG Rules ("111-MG0") scenarios.

In support of its Proposed Case, the Company is seeking Commission approval for its DSM Action Plan, including (i) approval for a certificate of public convenience and necessity for one new residential DSM program, (ii) decertification of three previously certified DSM programs, (iii) amended certificates for four previously certified DSM programs, (iv) a waiver of the TRC requirement for four previously certified DSM programs, and (v) updated program economics for all other previously certified DSM programs. Approval of these DSM programs is projected to result in, on average, approximately 224 megawatts ("MW") of peak demand reduction and 741 gigawatt hours ("GWh") of energy reductions annually for 2026–2028. Although the economics of these programs are complicated, the Company continues to support offering DSM programs that minimize upward pressure on rates and maximize economic efficiency, especially as those programs contribute to high customer satisfaction.

Regarding DSM pilot programs and initiatives, the Company has launched seven residential pilot initiatives and six commercial pilots since the 2022 IRP. These programs inform future energy efficiency program design, and the Company seeks approval of a total of $3 million to continue these pilot studies as part of its DSM Action Plan. The Company is also requesting modifications to the additional sum methodology for these DSM programs, which will be simpler and likely more stable than the existing methodology.

Based on recent experience and customer feedback, the Company is proposing enhancements to its Utility Scale and Distributed Generation ("DG") renewable procurement processes. For both the Utility Scale and DG requests for proposals

("RFP"), the Company proposes new processes such as a submission refresh process to allow RFP participants the option to "buy down" the total cost of their submission, as well as offering extended RFP periods, which will maximize opportunities for project selection and procurement to meet customer renewable subscription needs. For Utility Scale RFPs specifically, the Company proposes adding flexible Required Commercial Operation Dates ("RCOD") and will continue to consider the use of operational tools and flexibility as solutions to support interconnection viability for projects. For DG RFPs, the Company proposes to make the energy procured through these RFPs available for subscription and seeks to include solar resources coupled with dispatchable storage as part of the procurement process. The Company also proposes to incorporate locational value to DG resources evaluated during Georgia Power's DG RFPs. With these enhancements, the Company is seeking to procure energy from up to 4,000 MW of new renewable resources by 2035, beginning with 1,000 MW from Utility Scale Resources through an RFP in 2026, and 100 MW from DG resources.

The Company is making several proposals related to its renewable and resiliency customer programs. For the Clean and Renewable Energy Subscription ("CARES") Utility Scale program, the Company proposes refinements to its Notice of Intent ("NOI") process, adding greater flexibility, and modifying its pricing methodology to reduce financial risks to non-participating customers. The Company also seeks to expand the CARES program to offer subscriptions to DG resources that are procured through Georgia Power's DG RFPs.

The Company seeks approval of the new Customer-Sited Solar Plus Storage Pilot Program, which will enhance options for customers interested in installing renewable resources at their premises. The Company also seeks to modify the existing Customer Connected Solar Program to add storage resources, increase the size of eligible facilities, and allow customers without billing history to participate.

The Distributed Energy Resource ("DER") Customer Pilot, DER Colocation Program, and DER Customer-Owned Program were all previously approved and

are an important component of the Company's customer program portfolio. The Company is seeking to modify the DER Customer-Owned Program to allow contract terms up to 15 years. Otherwise, the Company is working closely with customers to move forward with projects in these programs and on its DER tariffs. In this 2025 IRP, the Company is proposing the Large Customer Owned Resiliency ("LCOR") Program, which is aimed at transmission-connected C&I customers. This program allows participants to retain ownership of their DER assets while providing Georgia Power with operational certainty that the assets will respond when called upon.

Finally, the Company is proposing a new Vehicle-to-Grid ("V2G") pilot program, which would enable electric buses at four school customer locations to transfer energy stored in their batteries back to the grid. By implementing this pilot program, the Company hopes to gain a better understanding of the costs associated with managing and administering this type of technology and the capabilities and value this technology provides to the Georgia Power electric system ("System").

Q. HOW IS YOUR TESTIMONY ORGANIZED?

A. The remainder of our testimony is organized as follows:

- Section II discusses the Company's Demand Side Strategy.
- Section III discusses enhancements to Georgia Power's Renewable Procurement Strategy.
- Section IV discusses the Company's Renewable and Resiliency Customer Programs, which includes a discussion about each of the following:
  - Modifications to the CARES program.
  - Customer Sited Renewable Offerings.
  - Customer Sited Resiliency Programs, including Georgia Power's DER Programs.
  - Vehicle to Everything Pilot.

II. DEMAND SIDE STRATEGY

Development of the DSM Portfolio

Q. HOW DOES GEORGIA POWER'S CURRENT DSM PORTFOLIO COMPARE TO ITS PROPOSED DSM PORTFOLIO?

A. Georgia Power's current DSM portfolio consists of a combination of energy efficiency programs, a demand response program, pilots, and other DSM activities. The Company's proposed DSM portfolio in the 2025 IRP ("Proposed Case") continues to treat energy efficiency as a priority resource, aligning with Commission policy.

Consistent with the Vogtle Prudence Order, the Company's Proposed Case includes a performance savings target of 0.75% of annual retail sales. Further, in accordance with the Commission's Order Adopting Stipulation in the 2022 IRP (the "2022 IRP Order"), the Company also developed the "Supply-Side Case," modeling DSM programs alongside supply-side resources to identify combinations of supply-side and DSM resources to reliably meet load.

Additionally, the Proposed Case includes a new program offering, modifications to existing programs, and requests to decertify certain programs deemed no longer cost-effective. The Company projects that by 2028, its current DSM portfolio will represent approximately 1,400 MW, or approximately 8% of the Company's current peak demand. In this 2025 IRP, the Company is proposing a DSM plan that will result in an additional 741 GWh of energy reductions annually and 224 MW of peak demand savings for the years 2026–2028.

Q. PLEASE DESCRIBE THE DEVELOPMENT OF THE PROPOSED DSM PLAN.

A. The proposed DSM plan was developed in accordance with the Commission-approved DSM Program Planning Approach, a nine-step process that ensures

thorough evaluation and stakeholder engagement. The Company retained third-party consultants to assist with the planning, implementation, and evaluation of the DSM programs certified in the 2022 IRP Order. The Company completed and filed the Achievable Energy Efficiency Potential Assessment in January 2024 (with a subsequent Errata filing in November 2024) in the 2023 Demand Side Management Working Group docket, Docket No. 45051.

The Company continues to follow the Commission's economic screening policy outlined in the 2004 IRP Final Order in Docket No. 17687, which directs that the proposed DSM plans minimize upward pressure on rates and maximize economic efficiency. The Company evaluates the impact of its DSM programs on rates through the Rate Impact Measure ("RIM") test and determines the economic efficiency of its DSM programs using the Total Resource Cost ("TRC") test. As demonstrated through the Company's planning processes, DSM is treated as a priority resource and reduces the Company's energy and demand forecast before supply-side alternatives are considered.

Georgia Power collaborated with the DSMWG to develop, discuss, and refine DSM program concepts for the 2025 IRP. The DSMWG provided feedback on program design, economic modeling, and customer outreach strategies. The Company engaged with the larger DSMWG eight times since 2022 to discuss proposed program modifications and new initiatives, as well as a subset of the DSMWG to specifically work through program ideation. This process ensured broad stakeholder input in the DSM program development process.

Georgia Power's DSM plan also incorporates findings from recent program evaluations, updates to measure impacts, and economic analyses using the TRC and RIM tests. The DSM Program plans have also been informed by developments since the 2023 IRP Update, including the issuance of the Vogtle Prudence Order and an increase in the marginal cost of generating energy. The DSM Program plans included in the DSM Application represent a well-balanced portfolio of residential

and commercial DSM programs that are structured to help customers reduce and better manage their energy usage.

Q. DOES THE PLANNING PROCESS THAT THE COMPANY USED TO DEVELOP THE PROGRAMS SATISFY THE COMMISSION'S DSM EVALUATION RULE?

A. Yes. Georgia Power's planning process adheres to the Commission's DSM evaluation rule. The process included stakeholder engagement, adherence to the DSM Program Planning Approach, and economic screening that aligns with Commission standards. The DSM portfolio was developed through a rigorous assessment of market potential, cost-effectiveness testing, and alignment with regulatory expectations. Completion of the DSM Program Planning Approach, including the filing of the Achievable Energy Efficiency Potentials Assessment, satisfies the requirements of the Commission's DSM Evaluation Rule.

Q. HOW WERE THE PROGRAMS CERTIFIED BY THE COMMISSION IN THE 2022 DSM APPLICATION AND THE 2023 IRP UPDATE EVALUATED?

A. Georgia Power engaged third-party consultants to assess program performance for both the 2022 DSM programs and those modified in the 2023 IRP Update. Evaluations focused on energy savings, cost-effectiveness, and market impact. The findings informed the program adjustments proposed in the 2025 IRP.

Q. DID THE COMPANY CONSIDER THE POTENTIAL IMPACT OF THE SECTION 111 GREEN HOUSE GAS RULES WITH RESPECT TO ITS DSM ECONOMIC ANALYSIS?

A. Yes, the Company's DSM program economic analysis includes an evaluation of the MG0 and 111-MG0 scenarios.

Development of the DSM Cases

Q. HOW DID THE VOGTLE PRUDENCE ORDER INFLUENCE THE DEVELOPMENT OF THE DSM PROPOSED CASE IN THIS IRP?

A. In developing the Company's Proposed Case, Georgia Power established the energy savings target in compliance with the Vogtle Prudence Order, which required Georgia Power to propose a DSM performance savings target of at least 0.75% of annual retail sales. Consistent with the composition of the Company's current DSM portfolio, these savings were calculated to come from the residential and commercial customer classes only.

Q. DOES THE COMPANY SUPPORT THE PROPOSED CASE?

A. Yes. As explained previously, the Proposed Case provides a comprehensive portfolio of energy efficiency and demand response programs, pilots, and other DSM initiatives prepared through the Commission's DSM Program Planning Approach, consistent the Commission's policy of minimizing upward pressure on rates and maximizing economic efficiency, in compliance with prior Commission orders.

Q. WHAT IS THE CAPACITY AND AFFORDABILITY CASE?

A. The Capacity and Affordability case is a sensitivity developed for informational purposes. Although the Proposed Case provides substantial energy savings, those savings come at an increased cost to customers, the majority of whom do not participate or receive savings from the DSM portfolio. The Company continues to see value in DSM as a priority resource and presents the Capacity and Affordability Case so the Commission can consider how to best balance energy savings and customer rate impacts.

Q. PLEASE DESCRIBE EACH OF THE DSM CASES PRESENTED IN THIS IRP.

A. Georgia Power analyzed the following four DSM cases to evaluate the potential for varying levels of DSM investment and their associated impacts, including cost-effectiveness:

- **Proposed Case**: The Proposed Case adopts the 0.75% of annual retail sales savings target established by the Vogtle Prudence Order. The demand response and energy efficiency programs included in the Proposed Case are projected to achieve approximately -$16 to $3 million in annual net TRC benefits while putting upward pressure on rates of approximately $630 to $746 million annually under the MG0 economic scenario. For the 111-MG0 economic scenario, the Proposed Case is projected to achieve approximately -$3 to $24 million in annual net TRC benefits while putting upward pressure on rates of approximately $609 to $733 million annually over years 2026, 2027, and 2028.

- **DSMWG Advocacy Case**: Based on requests made by certain members of the DSMWG, the DSMWG Advocacy Case was developed as a sensitivity to the Proposed Case. The DSMWG Advocacy Case is similar to the Proposed Case but includes an industrial program. The implementation of the DSMWG Advocacy Case would achieve approximately -$12 to $8 million in annual net TRC benefits while putting upward pressure on rates of approximately $641 to $761 million annually under the MG0 economic scenario and achieve approximately $1 to $29 million in annual net TRC benefits while putting upward pressure on rates of approximately $620 to $748 million annually under the 111-MG0 economic scenario for years 2026–2028. The Company does not support the inclusion of an industrial DSM program because the Company's experience has shown that industrial customers generally adopt DSM and energy efficiency measures on their own, without the need for customer-funded incentive programs. As such, the Company does not recommend this case and

presents the results of the DSMWG Advocacy Case for informational purposes only.

- **Supply-Side Case**: As agreed to in the 2022 IRP Stipulation and approved by the Commission, the Supply-Side Case modeled DSM programs alongside supply-side resources to identify the most cost-effective combination of supply-side resources and DSM programs. The Supply-Side Case replaces the previously used Aggressive Case in the DSM Program Planning Process for the 2025 IRP. The supply side modeling system, Aurora, evaluates resources on a relative net present value basis, so traditional DSM cost-effectiveness tests are not applicable. Under the 111-MG0 economic scenario, the Supply-Side Case yielded the highest annual costs in the years 2026–2028 of any of the four DSM cases. In addition, the MG0 scenario selected no income-qualified programs for the years 2026–2028.The Company does not recommend adoption of the Supply-Side Case.

- **Capacity and Affordability Case**: The Capacity and Affordability Case was developed in light of the significant upward pressure on rates resulting from the Proposed Case, and attempts to substantially mitigate the upward pressure on rates associated with the Proposed Case. The Capacity and Affordability Case strikes a balance between customer affordability concerns, capacity constraints, and the value of energy efficiency programs. This case achieves approximately $80 to $92 million annually in net TRC benefits from 2026–2028 while putting upward pressure on rates of approximately $162 to $211 million annually under the MG0 economic scenario. Under the 111-MG0 scenario, the Capacity and Affordability Case achieves approximately $84 to $100 million annually in net TRC benefits while putting upward pressure on rates of approximately $154 to $206 million annually from 2026–2028.

Q. WHAT SPECIFIC APPROVAL IS THE COMPANY SEEKING IN THIS CASE?

A. Georgia Power seeks Commission approval of the Company's DSM Action Plan for the Proposed Case, which includes (i) approval for a certificate of public convenience and necessity for one new residential DSM program, (ii) decertification of three previously certified DSM programs, (iii) amended certificates for four previously certified DSM programs, (iv) a waiver of the TRC requirement for four previously certified DSM programs, and (v) updated program economics for all other previously certified DSM programs. Further, the Company requests modifications to the additional sum methodology and approval to continue other DSM activities like the Learning Power Education and Energy Efficiency Awareness initiatives and pilot studies.

The DSM Programs

Q. PLEASE DESCRIBE THE NEW RESIDENTIAL PRODUCTS PROGRAM THAT THE COMPANY SEEKS TO CERTIFY.

A. The Residential Products Program is designed to incentivize customers to adopt high-efficiency appliances, electronics, and home energy upgrades by providing rebates for ENERGY STAR-certified HVAC systems, smart thermostats, water heating, and other technologies. The program integrates customer education initiatives to promote long-term efficiency improvements. A key aspect of the Products program is for the customer to achieve energy and demand savings through the installation of energy-efficient measures. Participating customers have multiple channels to access discounts, rebates, and other incentives to purchase energy efficient products that bring additional energy and demand savings to their home.

Q. PLEASE EXPLAIN WHY THE COMPANY SEEKS TO DECERTIFY THE RESIDENTIAL REFRIGERATOR RECYCLING PLUS PROGRAM.

A. The Company seeks to decertify the Residential Refrigerator Recycling Plus Program due to several key factors limiting its effectiveness and efficiency. As newer appliances are and have been designed to be more energy-efficient and have entered the marketplace over the last three decades, the potential energy savings from recycling such appliances have become significantly lower than in years past. Additionally, the costs associated with recycling appliances like refrigerators and freezers have increased. This imbalance between decreasing savings and rising costs makes the program less cost-effective. There are also fewer appliance recycling vendors available in the market, complicating the implementation and operation of the recycling program as designed and further reducing its feasibility.

Given these considerations, continuing the Residential Refrigerator Recycling Plus Program is no longer practical. The Company aims to reallocate these resources to other programs that can deliver greater energy savings and benefits to our customers.

Q. PLEASE EXPLAIN WHY THE COMPANY SEEKS TO DECERTIFY THE RESIDENTIAL SPECIALTY LIGHTING PROGRAM.

A. The Company proposes to decertify the Residential Specialty Lighting Program due to significant changes in the market and regulatory landscape. Over the last several years, there has been a substantial shift towards the widespread availability of residential energy-efficient lighting options, largely driven by market transformation and enhanced federal regulations. Together, these have made energy-efficient lighting products more accessible to consumers.

As a result, the need for incentivizing such lighting measures through designated programs has diminished. The energy savings that were once achieved through the program are no longer as significant because consumers can now easily obtain these

energy-efficient lighting without additional incentives. Consequently, continuing to support this program is not cost-effective for the Company. By reallocating resources from this program, the Company can focus on other initiatives that offer greater energy savings and benefits to customers.

Q. PLEASE EXPLAIN WHY THE COMPANY SEEKS TO DECERTIFY THE COMMERCIAL BEHAVIORAL PROGRAM.

A. The Company requests the decertification of the Commercial Behavioral Program based on findings from a third-party evaluation that the program was not cost-effective. Per the 2022 IRP Order based on program evaluation findings, the Company suspended the implementation of the Commercial Behavioral Program in 2025, pending decertification.

Q. PLEASE DESCRIBE WHY THE COMPANY SEEKS A WAIVER OF COMMISSION RULE 515-3-4-.04(4)(A)(3) FOR ONE COMMERCIAL AND THREE RESIDENTIAL PROGRAMS.

A. Commission Rule 515-3-4-.04(4)(a)(3) requires that demand-side programs pass the TRC test. The Commercial Custom Program, Residential Home Energy Improvement Program, Residential Energy Assistance for Savings and Efficiency Program, and the Residential Hopeworks Program have demonstrated high customer satisfaction and market potential for energy savings. However, each of these four programs do not reflect positive TRC results for the 2025 IRP cycle due to the costs required to achieve the large energy savings goal represented in the Proposed Case. Therefore, to continue offering these programs to customers as part of the Company's proposed DSM plan, Georgia Power requests a waiver of Commission Rule 515-3-4-.04(4)(a)(3) for these four programs.

Q. FOR WHICH PROGRAMS IS THE COMPANY REQUESTING AMENDMENTS TO THE PROGRAM CERTIFICATES?

A. The Company seeks to amend the certificate for each of the four programs for which the Company is seeking a waiver of the TRC requirement. In addition, the Company seeks to amend the program certificates for the Residential Behavioral Program, the Residential Demand Response Program, the Commercial Prescriptive Program, and the Small Commercial Direct Install Program.

Evaluation and Impact of DSM Programs

Q. WHAT ARE THE EXPECTED IMPACTS OF THE COMPANY'S PORTFOLIO OF PROPOSED DSM PROGRAMS ON PEAK DEMAND AND ENERGY USAGE?

A. The Company projects that its proposed energy efficiency programs will result, on average, in approximately 224 MW of peak demand reduction and 741 GWh of energy reductions annually for 2026–2028, based on the planned implementation levels.

Q. HOW WILL GEORGIA POWER MEASURE THE SUCCESS OF THESE DSM PROGRAMS?

A. The Company will track program performance and progress toward achieving established goals on an ongoing basis. Through a RFP solicitation, Georgia Power will contract with independent, third-party evaluators to conduct comprehensive program evaluations at regular intervals (initially planned for three-year intervals). The evaluations will include market, process, and impact evaluations to review the program's operations, evaluate the program's impact on the local market, and verify the energy and demand savings produced by the program. The Company will begin implementing evaluation results and applying deemed savings to the new program cycle beginning in January 2029 to be consistent with the Company's three-year IRP and DSM planning cycles.

Q. WHAT STEPS DID THE COMPANY TAKE TO BALANCE THE INCREASED DSM SAVINGS TARGETS WITH COST-EFFECTIVENESS CONSIDERATIONS?

A. The Company performed TRC and RIM analyses to evaluate the cost-effectiveness of various program designs. While some programs remained cost-effective, others required modifications, and the Company is seeking decertification of a few programs due to declining economic viability. The Company designed channels within programs and grouped DSM offerings where possible to enable flexibility and options for obtaining energy savings with minimal program costs.

Q. HOW HAS THE INCREASED DSM SAVINGS TARGET AFFECTED THE TRC AND RIM TEST RESULTS FOR THE PROPOSED DSM PROGRAMS?

A. The increased savings target has led to declining TRC test results and negative RIM test results for several programs. Higher energy efficiency goals require additional resources, including higher incentives, which increase program costs and impact customer rates.

Q. HOW DID THE COMPANY CONDUCT THE ECONOMIC SCREENING FOR THE DSM PROGRAMS IN THE 2025 IRP?

A. The Company continues to follow the Commission's economic screening policy outlined in the 2004 IRP Order in Docket No. 17687. This policy requires the Company to offer a DSM plan that minimizes upward pressure on rates and maximizes economic efficiency. The Company screened each of the four DSM planning cases against the MG0 and 111-MG0 scenarios.

Q. HOW DOES THE COST-EFFECTIVENESS OF THE PROPOSED CASE COMPARE TO THE PROPOSED CASE APPROVED IN THE 2022 IRP?

A. Relative to the 2022 IRP economic test results, the TRC test results declined, and RIM test results remain negative for the Company's proposed case. For comparison, in the 2022 IRP, the Company's proposed case achieved approximately $90 to $112 million in net TRC benefits, while putting upward pressure on rates of approximately $325 to $334 million annually for years 2023–2025.

Q. WHAT IS THE PRIMARY CAUSE OF DECLINING DSM PROGRAM ECONOMICS?

A. Even though avoided energy costs have increased since the 2022 IRP, which has a positive impact on energy efficiency economics, both TRC and RIM test results have declined primarily due to the substantial resources and higher incentives needed to achieve high energy savings in the Proposed Case. This trend in declining economics continues to raise concerns for the Company as it strives to balance the economic benefits that DSM programs provide to participating customers with the rate impacts to all residential and commercial customers, whether they participate in the programs or not. The Company plans to monitor program costs and economics through 2028 and will be prepared to modify programs if significant upward pressure on rates continues.

Q. WHY IS THE COMPANY SEEKING APPROVAL TO CONTINUE DSM PROGRAMS IF THEY ARE LESS ECONOMIC THAN THEY WERE THREE YEARS AGO IN THE 2022 IRP?

A. As stated previously, the Company continues to support offering a DSM plan that minimizes upward pressure on rates and maximizes economic efficiency, consistent with existing Commission policy. The Company used this same philosophy in analyzing the slate of programs considered for certification in the 2022 DSM

Application and the 2023 IRP Update. As the net benefits from these programs decline and the cost in terms of rate impact increases, it becomes more challenging to maintain that balance.

Nevertheless, in light of DSM program benefits, the Company supports the continuation of DSM as outlined in its DSM Action Plan. These programs are designed to enhance energy efficiency and provide customers with more control over their energy usage. In addition, these DSM programs contribute to high customer satisfaction, and customers expect that the Company will continue making these DSM programs available to them.

Building on the momentum from the 2022 IRP, Georgia Power continues to focus on offering additional DSM options for income-qualified customers. The Company is including additional measures, as well as measures for manufactured homes, in its Energy Assistance for Savings and Efficiency ("EASE") and HopeWorks programs. The Company has also increased the energy savings carve out for income-qualified participants in the Residential Behavioral Program to 33%. Further, the Company has designed EASE to include moderate income customers, who can also participate in the program and receive up to $5,000 of free energy efficiency improvements. Income level eligibility for these programs will be developed during program implementation based on market best practices, and will enable coordination with other energy efficiency programs, philanthropic groups, and governmental programs.

DSM Pilot Programs & Awareness Initiatives

Q. WHAT PILOT PROGRAMS WERE CONDUCTED SINCE THE 2022 IRP?

A. Since the 2022 IRP, Georgia Power has launched seven residential pilot initiatives:

- Income Qualified Portal;
- Manufactured Homes;
- Phase Change Insulation;

- EV Managed Charging;
- All-in-One Heat Pump Washer Dryer;
- Sense Energy Efficiency; and
- the Equity Insights and Engagement Research pilot.

Additionally, the Company launched six commercial pilots:

- Energy Monitoring and Intelligence;
- Digital Twin Energy Management;
- IoT Building Management;
- Aeroseal Duct Insulation;
- Small Commercial Induction Cooking; and
- Small Commercial Direct Install Equity and Engagement Research pilot.

These pilots inform future energy efficiency program design with measurement and verification of emerging technology and customer satisfaction. They directly influence innovative DSM pilot and program delivery mechanisms. Some of these pilots continue to focus on providing historically under-represented customers and small and medium business customers access and participate in energy efficiency programs. The Company seeks Commission approval to continue pursuing DSM pilot studies as part of its DSM Action plan.

Q. WHAT IS THE COMPANY'S REQUESTED BUDGET FOR DSM PILOT STUDIES?

A. The Company seeks Commission approval for $1.5 million for residential and $1.5 million for commercial pilot studies annually, which is equal to the amounts approved in the 2019 and 2022 IRPs.

Q. IS THE COMPANY PROPOSING TO CONTINUE ITS ENERGY EFFICIENCY AWARENESS INITIATIVES?

A. Yes. The Company proposes to continue offering its energy efficiency awareness initiatives to customers, which promote the benefits of energy efficiency and educate customers about ways to save energy. Based on the continued success of this program and the high customer satisfaction derived from these initiatives, the Company has requested continued funding for these activities, consistent with what the Commission approved in the 2022 IRP.

Q. IS GEORGIA POWER PROPOSING TO CONTINUE ITS LEARNING POWER INITIATIVE?

A. Yes. The curriculum of the Learning Power Initiative promotes a grassroots understanding of energy and energy efficiency, with lessons for grades pre-K through 12. The program is highly interactive and hands-on, with lessons taught by skilled Georgia Power Education Coordinators. Education Coordinators are assigned a geographic region of the state, with an equitable distribution of students and schools. Between 2011 and December 31, 2024, the Company delivered 42,124 Learning Power Education Initiative programs to over 1.3 million students in Georgia. Based on the continued success of this program and the positive feedback from educators, the Company has requested continued funding for these activities, consistent with what the Commission approved in the 2022 IRP.

Regulatory Treatment of DSM Program Costs and Additional Sum

Q. PLEASE DESCRIBE THE COMPANY'S REQUEST REGARDING DSM COST APPROVAL.

A. The Company is requesting Commission approval of the costs for all approved and certified DSM programs, pilots, and other DSM activities. In addition, the Company requests the continued collection of an additional sum. The budgets and costs for the Company's DSM programs are set forth in Appendix C to the DSM

Application, and the additional sum amounts are set forth in Appendix F to the DSM Application.

Q. PLEASE DESCRIBE GEORGIA POWER'S ADDITIONAL SUM REQUEST FOR THE PROPOSED CASE.

A. As stated in the DSM Application, the Company requests an additional sum equal to four cents for every kilowatt hour ("kWh") saved using verified net energy savings values applied to all certified DSM programs in the residential and commercial DSM portfolios. Any authorized additional sum will be specific to the corresponding customer class and will be collected through the residential and commercial DSM tariffs. The additional sum included in the DSM tariffs will apply the four cents per kWh saved to the total net energy savings estimated in the Proposed Case.

Q. WHY DOES THE COMPANY WANT TO CHANGE THE ADDITIONAL SUM METHODOLOGY?

A. The proposed additional sum methodology is simpler than the existing methodology and likely to be more stable. The proposed change in methodology also better aligns the additional sum with the energy savings achieved from the customer classes eligible to participate in the Company's residential and commercial DSM programs. Further, the proposed methodology will value energy savings from every program equally as opposed to the current methodology, where Georgia Power receives little to no additional sum from residential DSM programs that deliver kWh savings. The Company believes the proposed approach will also help streamline the reporting process and provide additional clarity around the annual DSM tariff true-up process.

Q. IF THE COMPANY IS USING VERIFIED NET ENERGY SAVINGS IN ITS CALCULATION OF THE ADDITIONAL SUM, ARE MARKET EFFECTS ALREADY TAKEN INTO ACCOUNT?

A. Yes. Market effects such as free-ridership and spillover are recognized in the industry as important data points for evaluating DSM programs and deciding whether to modify or continue DSM programs. Market effects are useful for program evaluations and modifications, as well as future program design and system planning.

Q. HOW DOES THE COMPANY PROPOSE TO COLLECT DSM PROGRAM COSTS AND THE PROPOSED ADDITIONAL SUM?

A. Georgia Power proposes to collect the costs of approved and certified DSM programs and activities, as well as the additional sum amount for certified DSM programs, through the existing residential and commercial DSM tariffs. These tariffs would be filed as part of the Company's next base rate case and would be implemented with any approved change in rates thereafter.

Q. WILL THE DSM TARIFFS BE TRUED UP?

A. Yes. Consistent with current practice, the DSM tariffs will initially be based on projected program costs and participation levels, and projected additional sum values approved in the 2025 IRP and DSM Application. Subsequently, the DSM tariffs should be trued-up annually based on actual program costs and participation levels, and actual revenues collected using the true-up methodology agreed to by the Company and Commission Staff.

III. RENEWABLE PROCUREMENT AND PROGRAM STRATEGY

Renewable Procurement Strategy

Q. PLEASE DESCRIBE GEORGIA POWER'S NEED TO ENHANCE ITS RENEWABLE PROCUREMENT PROCESSES.

A. Georgia Power takes pride in the measured and disciplined approach it has taken over the last decade to responsibly integrate additional renewable resources onto its System for the benefit of all customers. Planning models indicate the continued addition of economic renewable resources offers value to all customers across multiple scenarios, and the actions of the Commission, the market, and the Company have delivered economic renewable resources to the System. Additionally, as the number of customers with sustainability goals increases, the Company has adapted its renewable procurement strategies to evolve with changing customer demand and the sustained interest in renewable subscription programs.

Through market interaction and recent RFP experience, the Company has identified several challenges and opportunities that necessitate modifications to further enhance its procurement processes. For example, changing interconnection processes and requirements, impacts from regulatory uncertainty and policy changes (tariffs, tax credits, grants, etc.), increasing scrutiny on land use, supply chain issues, and a difference in the timelines of proposed renewable procurements and transmission system improvements have all limited the Company's ability to meet its renewable RFP targets.

Further, the Company received feedback from market participants indicating a need for additional flexibility to navigate changing regulatory policies and supply chain dynamics, including modifications to RCODs. These market conditions, combined with customer desires for subscriptions to incremental renewable resources, drive the need for more flexibility in the Company's RFP process, including consideration of customer identified resources.

As a result of these challenges and the feedback received, Georgia Power's RFPs must become more flexible and adaptable to capture the value that renewable resources can offer to customers. To that end, the Company's proposed enhancements apply these lessons learned and are aimed at improving the efficiency and success of its renewable procurements.

Q. PLEASE DESCRIBE THE COMPANY'S PROPOSED ENHANCEMENTS TO THE RENEWABLE PROCUREMENT PROCESS.

A. Georgia Power proposes to modify its renewable procurement strategy by introducing several enhancements to its Utility Scale and DG RFPs. For both the Utility Scale and DG RFPs, the Company will continue using a best-cost evaluation methodology but will also introduce new processes such as (1) a submission refresh option to "buy down" project cost and (2) an extended RFP period designed to maximize opportunities for project selection and procurement to meet customer needs.

In the Utility Scale RFP process, the Company proposes adding flexible RCODs, allowing projects to have a wider range of acceptable in-service dates and enabling RFP participants and the Company to navigate market challenges such as supply chain disruptions and changing policy landscapes. Additionally, the Company will continue to consider the use of Transmission System operational tools and flexibility that support interconnection viability for projects and portfolios of projects.

For DG RFPs, the Company proposes to make the energy procured available for subscription and also seeks to include solar resources coupled with dispatchable storage to deliver additional capacity value to benefit all customers. Finally, the Company proposes to enhance its locational guidance to customers by updating the RCB framework used in the DG evaluation process to assign value to projects based on their geographic location. By incorporating locational value into the DG RFP evaluation, the Company aims to incentivize strategic siting decisions of flexible,

dispatchable resources to better support the System when and where it is needed most.

Utility Scale RFPs

Q. WILL THE COMPANY CONTINUE TO USE THE BEST COST METHODOLOGY IN ITS UTILITY SCALE RFP EVALUATIONS?

A. Yes. As approved in the 2022 IRP Order, the Company's ongoing RFPs are evaluated using the best-cost methodology, which enables procurement of renewable resources at the best cost for Georgia Power customers. This approach to the evaluation process considers all benefits delivered by proposals in relation to multiple planning scenarios. This process provides more flexibility for the Company, in conjunction with Staff and the Independent Evaluator, supporting a selection process that is more likely to meet RFP procurement targets.

Q. PLEASE DESCRIBE THE MULTI-PHASE RFP PROCESS PROPOSED BY THE COMPANY FOR ITS UTILITY SCALE PROCUREMENTS.

A. The Company proposes enhancing its utility scale procurements by implementing a two-phase process. In Phase I, the Company would implement a traditional RFP to procure resources. Phase I would also include an added submission refresh process to allow projects to "buy down" their project costs to provide the ability for more projects to be procured as needed.

Phase II is an optional phase in which the RFP remains active for an extended period and offers additional customer subscription opportunities. Phase II would only be available, if necessary, to address customer needs that may remain after the conclusion of Phase I.

Q. PLEASE EXPLAIN THE COMPANY'S PHASE I PROPOSAL.

A. As noted above, Phase I consists of a traditional competitive solicitation conducted in accordance with the Commission's RFP rules consistent with past practice. Each proposal submitted into an RFP is evaluated and ranked based on the levelized total net benefits to Georgia Power's customers on a dollar per MW hour ($/MWh) basis.[1] RFP submissions are then further evaluated by the Company and an Independent Evaluator for transmission and environmental impacts. Competitive submissions that meet the Company's best cost threshold are deemed to provide net benefits for customers are moved to a Short List. Short List proposals comprise the winning portfolio of resources that proceed to contract execution.

If customer subscription needs remain after the Company identifies the Short List in the traditional portion of the Phase I RFP, the Company proposes to then return to the fully evaluated list of proposals not selected for the Short List. These submissions will then be offered the opportunity to execute a contract or otherwise move forward in the process if the participant can refresh the submission price such that the net benefit of the project is equal to the average total net benefit of the Short List portfolio of resources originally selected. This submission price refresh process will be designed in compliance with Commission RFP rules to ensure that any additional projects selected through this process meet the Commission's certification requirements.

[1] The total net benefit of a proposal is calculated by comparing the costs customers will pay if the proposal advances to the projected costs customers would otherwise incur if the proposal were not advanced ("Total Net Benefit").

Q. PLEASE EXPLAIN THE COMPANY'S PHASE II PROPOSAL.

A. The Company proposes to add a second phase to the Utility Scale RFP process, which extends the RFP and allows new projects to be submitted at or below a price target that results in a Total Net Benefit that is greater than or equal to the average Total Net Benefit of the winning portfolio of resources from the Phase I procurement. As part of this Phase II process, customers interested in subscribing to the Company's CARES program can work with developers to self-identify resources and submit additional proposals to meet additional customer subscription demand not otherwise satisfied by Phase I of the proposed RFP process ("Customer Identified Resources" or "CIRs").

Project developers and potential subscribers can collaborate to submit proposals to meet a price target that ensures new projects will deliver a Net Benefit greater than or equal to the original portfolio's Total Net Benefits. Additionally, RFP participants can submit new proposals in this extended RFP process independently, offering potential subscribers the opportunity to subscribe to additional projects at prices that ensure no costs are shifted to non-participating customers. Proposals submitted into Phase II will undergo a full evaluation, including a transmission analysis, in order to provide final pricing that ensures such projects deliver value to all customers.

Phase II would only be made available if there are unmet CARES Utility Scale customer subscription needs. Thus, this additional phase provides additional customer subscription opportunities, if necessary, while simultaneously securing additional renewable resources in a manner that preserves benefits and protects all customers.

Q. WHAT DOES IT MEAN THAT THE COMPANY WILL OFFER FLEXIBLE CODS?

A. The Company will incorporate a range of RCODs sought in its RFPs rather than limiting resources to only one, specific COD window. Based on the outcomes of recent RFPs, Georgia Power has proposed to use a range of COD years to incorporate additional flexibility for participants and for the Company in its competitive solicitations.

Distributed Generation RFPs

Q. WHICH ENHANCEMENTS TO THE UTILITY SCALE PROCESS WILL ALSO BE APPLIED TO THE DG PROCUREMENT PROCESS?

A. The Company proposes to continue utilizing the best cost-methodology in its DG procurement process. Additionally, the Company proposes implementing the same two-phase RFP approach outlined above to the DG procurement process, including the Phase I plus the submission refresh process and the additional Phase II CIR process. As with the utility scale RFP process, the submission refresh option enhancement to buy down project costs in Phase I and the Phase II CIR process would be available only if there continues to be an unmet customer subscription need after the initial CARES DG RFP, including the need to supply the proposed Residential DG Community Solar Program.

Q. WHAT OTHER ENHANCEMENTS HAS THE COMPANY PROPOSED FOR ITS DG RFP?

A. The Company is proposing two additional enhancements that are new to the DG RFP process. First, the Company proposes adding the option for flexible DG resources that include battery energy storage systems ("BESS") as part of its procurement strategy. Second, the Company is proposing to offer more information to help RFP participants effectively locate projects through the use of locational value as part of the evaluation process.

Q. WHAT IS THE COMPANY PROPOSING WITH RESPECT TO FLEXIBLE DG SOLAR PROCUREMENT THAT INCLUDES BESS RESOURCES?

A. The Company proposes to procure flexible DG resources, with the opportunity to co-locate distribution-connected BESS resources, as part of its DG procurement process. With increasing solar penetration, operational flexibility and control at the distribution level is vital to ensure System reliability. Further, dispatchable BESS resources can deliver much needed capacity to the System and provide value to all customers. The ability to add solar charged or grid charged dispatchable BESS technology to solar facilities will enhance System capabilities and will afford more flexibility and control at the distribution level. Flexible DG resources will be recognized for the additional value delivered as part of the RFP evaluation process.

Q. WHAT LOCATIONAL GUIDANCE DOES THE COMPANY GIVE DG RFP PARTICIPANTS TODAY?

A. The Company implemented the statewide solar DG Hosting Capacity Tool in November 2023. This tool is a "heat map" that uses results from different feeder studies to help RFP participants locate potential sites for projects. The System is dynamic and is updated as new resources are added; therefore, the Company updates the Hosting Capacity Tool periodically to reflect such changes. The first annual update to the tool was released in December 2024 and the Company expects to update the tool on a semi-annual basis beginning in 2025.

Additionally, the Company offers interconnection guidance to assist developers in determining the feasibility of installing DG resources within the Georgia Power service territory. Together, the DG Hosting Capacity tool and the Company's existing interconnection guidance help RFP participants site projects in favorable locations.

Q. WHAT NEW LOCATIONAL VALUE CONSIDERATIONS WOULD THE COMPANY CONSIDER AS PART OF ITS PROPOSED ENHANCEMENT?

A. The updated RCB Framework introduces new locational value considerations into the Company's evaluation of renewable DG RFP submissions. To aid in the development of renewable DG resources in areas with more favorable interconnection conditions, the Company has replaced the deferred transmission investment component of the RCB Framework, which is applied to all resources regardless of location, with a geographically differentiated transmission system cost benefit factor in the DG RFP evaluation process to ensure the portfolio of resources selected provides the maximum benefits to Georgia Power customers.

Q. HOW WOULD THE COMPANY DETERMINE LOCATIONAL VALUE UNDER ITS PROPOSED ENHANCEMENT?

A. The locational value is determined by evaluating two alternative future system scenarios, one with and one without additional DG resources for each identified geographic region. The transmission investments and in service timing of projects are determined for each scenario's study horizon. The resulting differences in transmission project identification and timing are evaluated in an economic analysis that results in a benefit or cost attributed to DG resources.

Q. HOW WOULD THE PROPOSED LOCATIONAL VALUE CHANGES HELP RFP PARTICIPANTS SITE PROJECTS MORE EFFECTIVELY?

A. The proposed locational value changes would allow the Company to apply geographically differentiated transmission system costs and benefits to the evaluation process. By communicating those values to RFP participants as they consider project location, the Company expects to receive a portfolio of proposals that offer greater overall value to all customers, which would increase the chance those proposals are selected as winning resources in the procurement process.

Proposed Renewable Procurements

Q. WHAT DOES THE COMPANY SEEK TO PROCURE FROM RENEWABLE RESOURCES AS PART OF THE 2025 IRP?

A. Through the proposed enhanced procurement processes, the Company is seeking to competitively procure energy from up to 4,000 MW of new renewable resources by 2035, beginning with 1,000 MW from Utility Scale resources through an RFP to be issued in 2026; and 100 MW from DG resources. This amount represents an appropriate level of near-term procurement of new resources as the Company navigates the challenges of renewable integration, while maintaining a long-term renewable target amount that benefits all customers. At this level of procurement, the Company continues its measured and disciplined approach to renewable resource procurement for the benefit of all customers.

Q. HOW MANY RFPS IS THE COMPANY PROPOSING TO OFFER AND WHEN WILL THEY BE ISSUED?

A. The Company proposes to issue three RFPs, maintaining a steady cadence of solicitations while also providing for flexibility and adaptability in the procurement processes. First, the Company proposes to issue a Utility Scale RFP in 2026 that targets 1,000 MW of renewable resources anticipated to be online between November 30, 2030, and November 30, 2032, as part of a flexible COD window. Leveraging the proposed multi-phase RFP approach, this procurement would begin with the proposed Phase I of the Utility Scale RFP. To retain the flexibility to meet additional, unmet customer demand, the Company would initiate Phase II of its proposed process to procure up to an additional 3,000 MW by 2035, thus offering the ability for RFP participants and subscribing customers alike to contribute to the cost effectiveness of individual projects and support additional renewable resources.

Second, Georgia Power proposes to issue two DG RFPs, one in 2026 and one in 2027, each seeking 50 MW of resources with commercial operation in 2027, 2028, and 2029. Both DG RFPs would occur under the proposed Phase I of the DG RFP process and would add an additional Phase II procurement opportunity as proposed and if needed to meet customer demand.

The table below summarizes the Company's proposed RFPs:

RFP	Expected Issuance	Target (MW)	Expected COD
Utility Scale	2026	1,000	2030–2032
Distributed Generation	2026	50	2027–2028
Distributed Generation	2027	50	2029

Q. WHAT ADDITIONAL SUM DOES THE COMPANY REQUEST FOR ITS UTILITY SCALE AND DG RFPS?

A. Consistent with the additional sum approved in the 2022 IRP, the Company requests a levelized $4.00 per kilowatt-year ("kW-yr") AC of the procured amount annually for the term of each PPA entered into as a result of its Utility Scale and DG RFPs. Such an additional sum appropriately incents the Company to competitively procure additional resources and fairly considers lost revenues, changed risks, and an equitable sharing of benefits consistent with the additional sum authorized by statute.[2]

[2] *See* O.C.G.A. 46-3A-9 ("The approved or actual cost, whichever is less, of any certificated demand-side capacity option shall be recovered by the utility in rates, along with an additional sum as determined by the commission to encourage the development of such resources.").

Q. HOW DOES THE COMPANY PROPOSE TO RECOVER THE COSTS RELATED TO ITS RENEWABLE PROCUREMENTS?

A. Consistent with past practice, the Company proposes to recover the costs related to the procurement of renewable energy through the fuel cost recovery ("FCR") clause. Any participation charges designed to recover associated costs and paid by subscribing customer(s) (as described below) would be applied to the fuel clause to reduce FCR costs.

IV. RENEWABLE AND RESILIENCY CUSTOMER PROGRAMS

Customer Renewable Subscription Programs

Q. WHY IS THE COMPANY PROPOSING TO MAKE ALL THE ENERGY PROCURED THROUGH THE UTILITY SCALE AND DG RFPS AVAILABLE FOR SUBSCRIPTION?

A. Many Georgia Power customers continue to express increased interest in renewable energy programs. Consistent with the approach taken in the 2022 IRP and in response to growing customer demand, the Company proposes to continue to make the energy from every MW procured by the Utility Scale and DG RFPs available for subscription by qualifying customers. Through the Company's competitive procurement and subscription processes, renewable energy is procured to the benefit of all customers, while also allowing interested individual customers to access the attributes of these resources directly.

Q. PLEASE DESCRIBE THE PROPOSED MODIFICATIONS TO THE CARES PROGRAM.

A. The Company proposes enhancements to the CARES program to increase flexibility, expand customer participation, and align renewable procurement with demand while mitigating financial risks to non-participating customers. The Utility Scale RFP process has been modified to allow for additional procurement

opportunities if customer subscription demand is not met through the traditional RFP process, ensuring that interested customers have the opportunity to drive additional renewable procurement beyond initial targets. To improve the subscription process, the Company proposes to refine the NOI process, enabling greater customer participation through a Commission-approved methodology. Subscription terms now range from 10 to 30 years in five-year increments, with customers offered two pricing options: a renewable energy credit ("REC")-based fixed program portfolio charge without an hourly energy credit, or a fixed program charge based on the PPA price with an associated hourly energy credit.

To reduce financial risks to non-participating customers, the pricing methodology for the hourly energy credit will be modified, introducing reimbursement thresholds to ensure fairness and prevent negative impacts to nonparticipants. Increased subscription flexibility has also been incorporated to allow for increased procurement through the Phase I submission refresh process to buy down project costs if customer demand exceeds the initial megawatts procured. This enables additional projects from the competitive tier or target list, as appropriate, to revise their submission prices in a way that maintains or improves overall program benefits. If further subscription needs remain unmet, the RFP process will be extended through the proposed Phase II process to allow additional projects to be submitted for consideration. Through this process, customers would have the option to propose specific renewable resources for procurement through a CIR option, negotiating directly with developers, as well as the ability to subscribe to incremental resources at higher subscription prices that offset higher PPA costs. Successful proposals in this process will result in a PPA between Georgia Power and the facility owner, and a corresponding CARES Customer Agreement between Georgia Power and the subscribing customer. All RECs from these CIRs will be retired on behalf of the subscribing customer.

Q. PLEASE DESCRIBE THE CARES DG SUBSCRIPTION PROGRAM.

A. The Company proposes to expand the CARES program by offering subscriptions to resources procured through Georgia Power's DG RFPs. This expansion will provide more Georgia Power customers with the opportunity to participate in the CARES Program, as this part of the program will be available to eligible C&I customers with an aggregate demand between 1 MW and 3 MW, as well as Residential customers. Initial subscriptions will be available to eligible C&I customers from the initial procurement phase of each DG RFP. These customers will participate in the CARES NOI process similar to the Utility Scale CARES program. If C&I customer demand for subscriptions exceeds the MW procured through the DG RFP, the Company will initiate the Phase I submission refresh process (described previously) and Phase II of the DG RFP, if needed.

The DG Community Solar Program will allocate up to 10 MW of the initial 50 MW target from each DG RFP for subscription by residential customers. This Program will provide customers with access to solar from new DG facilities using a simplified CARES subscription methodology. Under this approach, residential customers will subscribe to solar energy through a pricing mechanism based on the PPA price, with energy credits calculated from the average value of the facility's production, factoring in Georgia Power's hourly operating costs of incremental generation per kWh. RECs will be retired on behalf of participating customers based on the actual output of the facilities.

Georgia Power is exploring opportunities to partner with third parties to reduce subscription prices for lower-income customers, thereby enhancing the value proposition for eligible participants. If demand exceeds the available MW allocation for residential customers, or if additional demand for DG subscriptions is identified from other customers, additional resources may be procured through the extended RFP process, which will allow developers the opportunity to bring in new subscribers and drive the need for incremental projects.

Customer-Sited Renewable Programs

Q. DOES THE COMPANY PROPOSE ANY CUSTOMER-SITED RENEWABLE PROGRAMS?

A. Yes. The Company seeks Commission approval of the Customer-Sited Solar Plus Storage Pilot, which will enhance options for customers interested in installing renewable resources at their premises. Additionally, the Company seeks to modify the existing Customer Connected Solar Program to add storage resources, increase the size of eligible facilities, and allow customers without billing history to participate. These programs expand upon Georgia Power's existing portfolio of customer-sited options to now include storage resources, enhancing customer resiliency and grid value through dispatchable capacity-benefitting resources.

Q. PLEASE DESCRIBE THE CUSTOMER-SITED SOLAR PLUS STORAGE PILOT PROGRAM.

A. The Customer-Sited Solar Plus Storage Pilot Program is designed to encourage the installation of solar plus battery storage at residential and small commercial sites. The pilot targets 50 MW of capacity, divided equally into two participation pathways: Customer-Directed and Company-Directed. Participants in either pathway can enroll systems up to 20 kW (residential) or 250 kW (small commercial). The systems will be interconnected behind the meter ("BTM"), can be owned by the participating customer or a third party, and will be dispatched by the Company to deliver capacity value to the System. The pilot aims to improve grid reliability, evaluate customer preferences, and enhance economic viability of dispatchable customer-sited solar-plus-storage resources.

Q. DESCRIBE EACH PARTICIPATION PATHWAY FOR THE CUSTOMER-SITED SOLAR PLUS STORAGE PILOT.

A. Under the Customer-Directed model, customers direct the use of the battery and can respond to discrete utility-called events to receive incentive payments. In

addition to an annual enrollment incentive of $15/kW, participating customers will receive payments based on the asset performance during called events of $1.50/kWh. New or existing assets are eligible to participate in this program.

Under the Company-Directed model, Georgia Power will monitor and control the BESS and operate it based on System needs. In exchange, customers receive a one-time upfront incentive of $750/kW for a 10-year commitment. Only new assets will be eligible to participate, and systems must pair solar and storage. In both models, the BESS is available for resiliency use by the customer in times of grid outage.

Q. ARE THERE ANY RATE LIMITATIONS ON WHICH CUSTOMERS CAN PARTICIPATE?

A. Yes. Although participating customers will retain their rate options, there are two proposed rate limitations: (1) participating residential customers cannot be on the residential ("R") rate, and (2) participating commercial customers cannot be on the general service ("GS") rate. These energy-only rates do not provide an appropriate time-of-use ("TOU") or demand signal to incentivize operation of the solar and battery resources to maximize System benefit. Participating customers will be eligible for other riders, including the renewable and nonrenewable resources ("RNR") rate.

Q. IS THERE A PARTICIPATION CAP ON THE PILOT?

A. The Company has not proposed a cap on participation, but rather presented a target enrollment it believes is feasible to implement over the IRP cycle. In the event the Company reaches the target enrollment before the 2028 IRP, the Company will present to the Commission potential program modifications based on lessons learned and seek approval to continue adding interested customers. This "check-in" approach would allow for feedback and learnings to be incorporated without signaling an anticipated end to, or ceiling on, enrollment.

Q. DID THE COMPANY COLLABORATE WITH STAKEHOLDERS IN DEVELOPING THE SOLAR PLUS STORAGE PILOT?

A. Yes. The Company participated in two collaboration sessions at the Commission and received additional feedback from participating stakeholders following those meetings. In addition, the Company had conversations with original equipment manufacturers ("OEMs"), installers, program facilitators, sources of potential complimentary funding, and customers. The Company also reviewed peer programs and talked with other utilities in the development process.

Q. DOES THE PILOT PROGRAM DESIGN ADDRESS FEEDBACK THE COMPANY RECEIVED THROUGH THE COLLABORATION PROCESS?

A. Yes. As described more fully in the IRP Main Document, the pilot program features a hybrid of upfront and ongoing compensation with incentives that are clear and simple to understand. As proposed, the pilot program allows for broad customer participation including those enrolled in time-varying rates, the RNR tariff, and other utility programs, and includes special consideration for low to moderate income customers. The pilot will leverage the battery inverter for measuring performance and does not penalize customers for non-performance. The program will support participation from multiple battery manufacturers; standalone storage; and existing systems. The pilot ensures at least 20% of battery capacity remains available for local resiliency, and provides for optionality to meet individual needs. By incorporating program design elements in consideration of direct feedback from stakeholders, that Company seeks to deliver a program that meets System, market, and customer needs.

Q. HOW DID THE COMPANY DETERMINE THE INCENTIVE VALUES TO BE OFFERED FOR PROGRAM PARTICIPATION?

A. The incentive values were calculated based on the forecasted avoided generation capacity value associated with assets participating in each pathway. The net present

value over the term was discounted to 75%, applying a shared savings model consistent with other DER programs. The Company intends this design to ensure participating customers receive sufficient incentive to install dispatchable resources and participate in the program, while also ensuring non-participating customers receive value and do not subsidize implementation and program administration costs.

In recognition of the unique needs of low-to-moderate income residential and municipal, university, school and hospital ("MUSH") commercial customers, the discount factor was not applied to derive incentives for customers in these segments. Further, the program was designed to allow and enable stacking of additional funding sources including resources specifically targeting these groups of customers.

Q. WHAT DOES THE COMPANY HOPE TO LEARN OR ACHIEVE THROUGH THIS PILOT PROGRAM?

A. The Company has designed the Customer-Sited Solar Plus Storage Pilot Program to provide the Company with valuable information regarding the technical capabilities, value, and market acceptance of customer-sited solar plus storage.

Additionally, as described in the Main panel, the Company has requested enhanced control through its Distributed Energy Resource Management System ("DERMS"). The parallel participation pathways allow for validation of the benefits accompanying enhanced control. The Company's DERMS will have the capability to dispatch DERs within program parameters, such that the Company will be able to optimize the operation to realize anticipated capacity value and explore additional use cases for solar plus storage and other programs.

Q. PLEASE DESCRIBE THE PROPOSED MODIFICATIONS TO THE CUSTOMER CONNECTED SOLAR PROGRAM.

A. Georgia Power proposes modifying the Customer Connected Solar Program by (1) increasing the facility site criteria to a 250 kW minimum and 6 MW maximum, (2) expanding the resource types to include BESS co-located with solar, and (3) allowing new customers to participate. The proposed enhancements are driven by stakeholder feedback. By expanding the eligibility criteria, the Company aims to fill the remaining 23+ MW to meet customer resiliency needs through this expanded front of the meter option. The capacity value created by the dispatchable storage systems will benefit all Georgia Power customers through enhanced reliability and affordability, will support customer resiliency goals, and support the growth of a sustainable customer-sited DG market in Georgia.

Other Customer Renewable Program Options

Q. ARE THE CARES SUBSCRIPTION AND CUSTOMER-SITED PROGRAMS THE ONLY OPTIONS AVAILABLE FOR CUSTOMERS TO SUPPORT RENEWABLE RESOURCES?

A. No. As stated in the 2025 IRP Main Document, customers will continue to have options to offset their own energy consumption using BTM customer-sited resources, offset their own energy consumption and sell any excess output through the RNR tariff, participate in Community Solar or one of the Company's REC purchase programs, or sell renewable energy to Georgia Power as a Qualifying Facility ("QF") under the Public Utility Regulatory Policies Act of 1978 ("PURPA"). Georgia Power has interconnected more than 12,000 solar projects to date, including customer generators who choose to offset energy usage with BTM solar installations, through RNR or as a QF.

Q. IS THE COMPANY PROPOSING TO MAKE ANY CHANGES TO THE COMMUNITY SOLAR PROGRAM?

A. No, Georgia Power is not requesting any modifications to the existing Community Solar Program. However, as described above, the Company has proposed the new DG Community Solar Program as an additional subscription option for residential customers.

Q. PLEASE DESCRIBE GEORGIA POWER'S EXISTING CUSTOMER-SITED RENEWABLE PROGRAMS.

A. The Company interconnects and receives energy from customer generators through several Commission approved options. The Energy Offset option exists for customers who wish to install on-site generation without compensation for energy pushed back to the grid. The RNR program enrolls customer generators who offset some of their usage with renewable energy generated onsite and compensates these generators for energy pushed back to the grid at the Company's Renewable Cost Benefit adjusted Solar Avoided cost, plus a $0.04 adder pursuant to the 2022 Rate Case. This adder creates additional costs for all customers as it pays customer generators more than the Company's avoided cost for this energy. Approximately 5,000 customer generators are compensated at retail rates for all the energy produced from customer sited generation through the fully subscribed Monthly Netting program. This program also creates significant upward rate pressure for non-participating customers by compensating above the avoided cost value. Finally, the Company complies with its purchase obligations pursuant to PURPA through standard offer purchases from QFs. The pricing for these transactions is based on the Company's projected day ahead hourly avoided costs and holds other customers harmless.

Q. PLEASE DESCRIBE THE EXISTING REC PROGRAMS.

A. The Simple Solar Program is available to residential, commercial, and industrial customers, allowing them to match either 50% or 100% of their monthly energy usage with solar RECs retired on their behalf. The program operates on a monthly basis with no long-term commitment required. Since its launch in 2022, it has consistently served around 1,800 customers, resulting in approximately 27,000 RECs being retired annually.

The Flex REC Program originated in the 2022 IRP as a replacement for the Simple Solar Large Volume program. It enables Georgia Power to procure larger quantities of RECs to meet increasing customer demand. This program sources RECs from a diverse range of renewable resources, including solar and wind, and potentially other renewable sources. Since its inception, Flex REC has maintained an average of 16 customers per month, retiring about 300,000 RECs annually on behalf of participating customers.

The Retail REC Retirement ("R3") program is designed for C&I customers who wish to claim renewable benefits from certain existing renewable resources. It allows these customers to subscribe to RECs from System resources that are either already operational or under construction. The RECs and associated environmental attributes, which would typically be retired on behalf of all customers, are instead retired specifically on behalf of the participating customer. Currently, there are no participants in this program, but it is expected to become a viable option as more customers aim to meet their carbon reduction goals within the next five years.

The Company is not proposing any modifications to these programs at this time.

Existing Customer Resiliency Programs

Q. PLEASE DESCRIBE THE DER CUSTOMER PILOT PROGRAM THAT THE COMMISSION APPROVED IN THE 2022 IRP.

A. Following the 2022 IRP, the Company developed the DER Customer Pilot Program alongside Commission Staff and intervenors, resulting in the Resiliency Asset Service ("RAS-1") and Demand Response Credit ("DRC-1") tariffs. These tariffs, approved in January 2023, provide a framework for customers seeking resiliency-focused solutions. For customers participating on RAS-1, Georgia Power will install and operate a dispatchable DER behind the customer's meter. Participating customers pay a monthly service charge for that resiliency benefit. Customers participating in RAST-1 also have the option to participate in DRC-1, in which Georgia Power will provide a credit in exchange for the Company's ability to use the DER for demand response during System reliability events.

Q. PLEASE DESCRIBE THE DER COLOCATION PROGRAM THAT THE COMMISSION APPROVED IN THE 2023 IRP UPDATE.

A. The DER Colocation program, as approved in the 2023 IRP Update Order, is an optional tariff available to qualifying C&I customers. Under this program, Georgia Power owns, operates, maintains, and controls dispatchable DERs located on customer premises, which are then economically dispatched to provide energy and capacity benefits to all customers. The DER systems are interconnected to the electric grid, allowing for energy transmission while also serving as a resiliency resource for participating customers during outages. Participating customers pay rates that ensure the DER investment remains below its system value, thereby providing financial benefits to all customers. The DER technology used in this program may include combustion turbines, reciprocating internal combustion engines ("RICE"), and other dispatchable technology with a firm fuel supply.

Q. PLEASE DESCRIBE THE DER CUSTOMER-OWNED PROGRAM THAT THE COMMISSION APPROVED IN THE 2023 IRP UPDATE.

A. The DER Customer-Owned Program is an optional program designed for qualifying C&I customers who own dispatchable DERs less than 10 MW. Under the DER Customer-Owned tariff ("DCO-1"), participating customers receive bill credits based on the capacity and energy value of their DERs. The program ensures that DER interconnections support the electric grid while also providing backup power during outages. Similar to the DER Colocation Program, a key difference under the DER Customer-Owned Program is that the customer retains ownership of the DER asset, while Georgia Power operates and controls the resource for economic dispatch.

Q. WHAT ARE THE COMPANY'S OBJECTIVES IN OFFERING THESE DER PROGRAMS TO CUSTOMERS?

A. DER programs are an important component of the Company's portfolio of customer programs. The Company is in regular communication with customers and continues to modify its suite of DER options to better align with customer interest and Company needs. The design of the Company's DER programs is intended to maximize mutual benefits among customers looking to make these types of onsite investments while leveraging the resilience and reliability benefits to the grid and all retail customers. In addition, the Company aims to encourage customers considering adding these resources to adopt cleaner resources.

Q. ARE ANY CUSTOMERS ENROLLED ON THESE DER TARIFFS?

A. Not yet, but the Company is working closely with customers to move forward with projects on its DER tariffs. Discussions are ongoing and several potential customers have progressed to evaluating contract language and site design elements.

Q. IS THE COMPANY PROPOSING ANY MODIFICATIONS TO EXISTING DER PROGRAMS?

A. Georgia Power is seeking to modify the DER Customer-Owned Program in the 2025 IRP to allow contract terms up to 15 years. Previous tariff language restricted contracts through 2031. Extending the potential contract duration increases the value proposition for both participating and non-participating customers. Participating customers will have increased certainty on the value stream to justify additional costs associated with participation. Non-participating customers receive the benefits of capacity locked in and procured at a discounted rate for an extended duration.

Proposed Customer Resiliency Program

Q. PLEASE DESCRIBE THE LARGE CUSTOMER OWNED RESILIENCY PROGRAM THAT GEORGIA POWER IS PROPOSING IN THE 2025 IRP.

A. The LCOR Program is a newly proposed program aimed at transmission-connected C&I customers. This program allows these customers to retain ownership of their DER assets while providing Georgia Power with operational certainty that contracted response will materialize when called upon by the Company for utility use. These assets are not intended to push back onto the grid and the resources do not need to be separately metered. Participating customers will be responsible for all fuel and O&M costs associated with the assets. As with the Company's other DER programs, assets must be dispatchable with firm fuel supply and permitted for non-emergency use. By expanding its DER offerings, Georgia Power aims to provide a robust portfolio of options for customers with diverse energy needs while ensuring grid resilience and affordability.

Q. WHAT ARE THE BENEFITS OF THE LCOR PROGRAM?

A. Benefits of the LCOR Program include:

- Economic Compensation: Participating customers are compensated for providing firm load reductions to the System and Georgia Power's need for additional capital expenditures is reduced.
- Faster Capacity Recognition: Unlike the supply-side DER programs that are subject to FERC-dictated interconnection timelines and requirements, this program accelerates the timeframe in which co-located resources can be utilized to meet capacity needs.
- Reliability Enhancement: The program ensures that load reductions materialize when needed, reducing uncertainty, increasing efficiency, and improving grid stability.
- Cost Savings for Non-Participants: Since the program operates under a shared savings model, the cost of procuring capacity is lower than traditional generation expansion, reducing costs for all customers.

Q. WHICH CUSTOMERS ARE ELIGIBLE TO PARTICIPATE IN THE LCOR PROGRAM?

A. The LCOR Program is designed for large C&I customers who meet the following eligibility criteria:

- Customers must own and operate dispatchable DERs with a firm fuel supply permitted for non-emergency use.
- The DERs must be connected to Georgia Power's grid and be available to respond based on System needs during a contracted number of hours.
- Customers must enter into a contractual agreement with Georgia Power to provide demand response contributions.
- Participants must meet the minimum capacity commitment during events as defined in the customer contract.

This program is particularly suited for businesses with critical energy needs, such as data centers, manufacturing facilities, hospitals, and logistics hubs, where backup power and load flexibility can be leveraged for grid resiliency.

Electric Transportation

Q. WHAT IS VEHICLE-TO-EVERYTHING TECHNOLOGY?

A. Vehicle-to-everything ("V2X") technology refers to the use of bi-directional charging technology that enables electric vehicles ("EVs") to transfer energy stored in their batteries back to buildings, houses, or the grid. With increasing EV deployment, a significant number of batteries will be in the market, and unused energy in those batteries could be beneficial as a grid asset.

Q. PLEASE DESCRIBE THE COMPANY'S PROPOSAL FOR A VEHICLE TO GRID PILOT PROGRAM.

A. The Company seeks to install up to 10 bi-directional chargers for a grid-specific, or V2G, pilot program across up to four customer locations. The pilot will be available to public school systems served by Georgia Power that utilize or plan to utilize electric school buses as part of their fleet.

Q. WHY IS A V2G SCHOOL BUS PILOT AN APPROPRIATE STARTING POINT TO EXPLORE V2X TECHNOLOGY?

A. School systems are particularly well-suited for V2G pilot programs for several reasons. First, school buses have regular, predictable schedules. They are typically in use during the morning and afternoon, idle for long periods during the day and overnight, and may not be in use at all during summer peak periods. This predictability makes it easier to manage charging and discharging cycles and utilize electric buses as a grid resource without impacting the school customer's transportation availability.

Second, school buses have large batteries that can store significant amounts of energy. This makes them ideal for providing substantial power back to the grid

during peak demand times, and the scale of available capacity justifies interconnection and equipment costs.

Third, school systems have already purchased electric buses and expressed interest in participating in a Georgia Power V2G program. Stakeholders submitted a V2G bus pilot idea as part of the DSMWG, and other utilities have launched pilots that can serve as a guide for implementation. Finally implementing V2G technology in school systems can serve as a model for other community-based projects, promoting broader adoption and awareness of V2G capabilities.

Q. WHAT DOES THE COMPANY HOPE TO LEARN FROM THE V2G PILOT?

A. The Company hopes to gain a better understanding of the infrastructure costs required to support V2G and the ongoing costs to manage and administer such technology. The Company also seeks to learn about the capabilities of V2G and the value of vehicles as a grid resource to provide capacity during peak periods and other use cases. Finally, the Company seeks to understand how customer behavior and preferences will impact the potential for vehicles to serve as a reliable grid resource while being used primarily as a transportation solution.

V. CONCLUSION

Q. WHAT ARE GEORGIA POWER'S REQUESTS FOR RENEWABLE RESOURCE PROCUREMENTS IN THIS CASE?

A. Georgia Power seeks Commission approval of the following renewable resource procurement requests:

1. The updated Utility Scale RFP process to procure energy from 1,000 MW of new Utility Scale renewable energy resources, along with the ability to procure additional resources above the initial MW target to meet the needs of subscribing customers.

2. The updated DG RFP process to procure energy from 100 MW of new DG solar resources through two separate RFPs (50 MW each), including the

incorporation of locational value in DG procurement evaluations and the ability to procure additional resources above the initial MW targets to meet the needs of subscribing customers.

3. The levelized additional sum of $4.00 / kW-yr AC of the total capacity amount from which renewable energy is procured from the Utility Scale and DG RFPs proposed in this IRP, annually for the term of each PPA.

Q. WHAT ARE GEORGIA POWER'S REQUESTS AS IT RELATES TO CUSTOMER PROGRAMS IN THIS CASE?

A. Georgia Power seeks Commission approval of the following requests regarding its DSM Action Plan for the Proposed Case, DER Resiliency Programs, and customer renewable programs:

DSM:

1. Grant a certificate for the Residential Products program.

2. Decertify the Residential Refrigerator Recycling Plus program, the Residential Specialty Lighting program, and the Commercial Behavioral program.

3. Amend the certificate for four (4) previously certified programs:

    i. the Residential Behavioral program;
    ii. the Residential Demand Response program;
    iii. the Commercial Prescriptive Program; and
    iv. the Small Commercial Direct Install program.

4. Grant a waiver of the TRC requirement within Commission Rule 515-3-4-.04(4)(a)(3) for four (4) previously certified programs:

    i. the Residential HopeWorks program;
    ii. the Residential Home Energy Improvement program;
    iii. the Residential Energy Assistance for Savings and Efficiency program; and
    iv. the Commercial Custom program.

5. Approve the updated program economics for all previously certified DSM programs.

6. Approve the revised additional sum calculation methodology collected through the DSM programs certified in the 2025 DSM Application.

7. Approve the Company's other DSM activities as further specified in the Company's 2025 IRP in Docket No. 56002, including the Energy Efficiency Awareness Initiative, pilot studies, and Learning Power Education Initiative.

DER Resiliency Programs:

1. Approve the modification of the DER Customer Owned Program to allow contracting up to 15 years.

2. Approve the new Large Customer Owned Resiliency Program as described in the 2025 IRP.

3. Approve an additional sum of $4/kW-year AC for new demand response and new DER programs, including the Large Customer Owned Resiliency Program, Solar + Storage Pilot Program, and modified Customer Connected Solar Program.

4. Approve the V2G Pilot.

Customer Renewable Programs:

1. Approve the enhanced CARES subscription program, including the ability for participating customers to subscribe to smaller, DG resources; the opportunity for residential customers to subscribe through the DG Community Solar Program; more flexible participation provisions; and the ability for customers to identify renewable resources to be considered for procurement, as described in the 2025 IRP.

2. Approve modifications to the Customer Connected Solar Program as described in the 2025 IRP.

3. Approve the small commercial and residential Customer-Sited Solar Plus Storage Pilot Program as described in the 2025 IRP.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes.

EXHIBIT
tabbies
CEBA - 1
6-24-25

Georgia Power

ELECTRIC SERVICE TARIFF:

CARES CARBON FREE ENERGY - AROUND THE CLOCK SCHEDULE: "CFE-ATC-1"

PAGE	EFFECTIVE DATE	REVISION	PAGE
1 of 3	With Bills Rendered for the Billing Month of January, 2023	Original	11.75

AVAILABILITY:

Available throughout Georgia Power Company's service area from existing lines of adequate capacity.

APPLICABILITY:

Available to existing or new Commercial and Industrial customers that are adding incremental new electric load of twenty-five (25) megawatts (MW) or greater or are currently taking electric service from Georgia Power and have a minimum annual aggregate peak demand of twenty-five (25) MW. Projections for new electric load must be assessed and verified by Georgia Power in order to confirm the twenty-five (25) MW minimum threshold. Customers that have more than one premises served by Georgia Power may aggregate the demand at each such premises to meet this requirement, provided that (i) the aggregated peak demand of the premises is greater than or equal to twenty-five (25) MW and (ii) the premises are under common ownership or under common control. Premises may have service points at different standard voltages.

PARTICIPATION FEE:

An eligible customer wishing to subscribe to the Clean and Renewable Energy Subscription (CARES) Carbon Free Energy – Around the Clock (CFE-ATC) tariff must submit a Notice of Intent (NOI) in Georgia Power's CARES CFE-ATC NOI process and pay a one-time $10,000 application fee. The Company will accept subscription requests from eligible applicants during the CARES CFE-ATC NOI period.

DESCRIPTION:

Through this tariff, participating customers may purchase a subscription in connection with a portfolio of renewable energy facilities, paired with battery energy storage, that are procured through Georgia Power's renewable utility scale request for proposals process (CARES CFE-ATC Portfolio). Each participating customer will pay a monthly CARES CFE-ATC tariff charge (Portfolio Price) that will be separate and in addition to the cost of electric service under the customer's retail electric service tariff. In exchange for payment of the Portfolio Price, each participating customer will receive Hourly Credits and a monthly fixed Capacity Credit in an amount based on the customer's subscription level and the corresponding pro-rata share of the output of the CARES CFE-ATC Portfolio, as measured in kilowatt-hours (kWh).

The Portfolio Price, Hourly Credits and Capacity Credit will be calculated and applied consistent with the formula and values set forth below in connection with the monthly CARES CFE-ATC amount (CARES CFE-ATC $_{Mo.}$) for each customer. Georgia Power will retire renewable energy credits (RECs) associated with the output of the CARES CFE-ATC Portfolio on behalf of participating customers according to each customer's subscription level and the corresponding pro-rata share of the output of the CARES CFE-ATC Portfolio. The energy produced by the CARES CFE-ATC Portfolio will be transmitted onto Georgia Power's electric system and will not be distributed directly to participating customers. Customers subscribing to the CARES CFE-ATC tariff will continue to be served on a network basis from all energy resources generating into or otherwise supplying the Company's electric system.

SCHEDULE: "CFE-ATC-1"

PAGE	EFFECTIVE DATE	REVISION	PAGE
2 of 3	With Bills Rendered for the Billing Month of January, 2023	Original	11.75

SUBSCRIPTION LEVEL:

Each participating customer's subscription level will be limited to one hundred percent (100%) of the customer's preceding year's total annual energy consumption at the premises served under this tariff or the projected total annual energy consumption at the premises served under this tariff, as applicable. If a customer elects to qualify for subscription to this tariff by aggregating the peak demand for more than one of the customer's premises, then that customer's subscription level will be limited to one hundred percent (100%) of the customer's total aggregate annual energy consumption for each of the premises combined, as applicable. Customer load eligible for subscription may not include load already associated with participation in any other Georgia Power renewable subscription program. Once established, the customer's subscription level will be fixed for the term of the customer's required CARES CFE-ATC Customer Agreement, as further described below, unless reduced in accordance with the terms of the Agreement. A participating customer's subscription level will be subject to review and may be adjusted as defined in the customer's required CARES CFE-ATC Customer Agreement.

PRICING & BILL DETERMINATION:

The Portfolio Price is a fixed price per kWh charge comprised of a levelized weighted average supply cost of the CARES CFE-ATC Portfolio, a levelized transmission cost, a Renewable Integration Cost, a levelized additional sum, an Administrative Fee, and an Optional Community Adder Fee. Billing for each month's service under this tariff will be settled one month in arrears according to each customer's subscription level and in accordance with the formula set forth below:

A monthly CARES CFE-ATC amount (CARES CFE-ATC $_{Mo.}$) will be calculated for each customer using the following formula:

$$\text{CARES CFE-ATC}_{Mo.} = \sum [\text{CARES CFE-ATC Portfolio Production}_{Hr.} \times (\text{Portfolio Price} - \text{Hourly Credit}_{Hr.})] - \text{Capacity Credit}_{Mo.}$$

Where:

$\sum$ = Sum over all hours of the monthly billing period.

CARES CFE-ATC Portfolio Production $_{Hr.}$ = Customer's pro-rata subscription share in kWh of the output produced from the CARES CFE-ATC Portfolio on an hourly basis as measured at the point of interconnection.

Portfolio Price = Fixed price per kWh charge comprised of a levelized weighted average supply cost of the CARES CFE-ATC Portfolio, a levelized transmission cost, a Renewable Integration Cost, a levelized additional sum, an Administrative Fee, and the Optional Community Adder Fee. The Portfolio Price will be applied according to the customer's subscription level and consistent with the CARES CFE-ATC $_{Mo.}$ calculation set forth above. In the instance where the customer term does not align with the asset term a risk cost adjustment will be included.

Hourly Credit $_{Hr.}$ = Company's hourly operating costs of incremental generation per kWh. Hourly Credits will be applied according to the customer's subscription level and consistent with the CARES CFE-ATC $_{Mo.}$ calculation set forth above. Hourly Credits will be applied to generation as measured at the point of interconnection.

Capacity Credit $_{Mo.}$ = Customer's pro-rata subscription share in $/kW of the CARES CFE-ATC Portfolio avoided or deferred generation capacity.

Renewable Integration Cost = $0.00193 per kWh applicable to solar generation exceeding the customer's pro rata kW subscription share. Integration cost accounts for the operating reserves cost required on the system to mitigate the impacts of solar intermittency.

SCHEDULE: "CFE-ATC-1"

PAGE	EFFECTIVE DATE	REVISION	PAGE
3 of 3	With Bills Rendered for the Billing Month of January, 2023	Original	11.75

Administrative Fee = $0.00025 per kWh applied throughout the participating customer's contract term as defined in the CARES CFE-ATC Customer Agreement.

Optional Community Adder Fee = Fixed price per kWh decided by the participating customer at the time of contract. The Community Adder Fee revenue will be used to fund a dedicated community-based program.

MUNICIPAL FRANCHISE FEE:

The bill calculated under this tariff will be increased under the provisions of the Company's effective Municipal Franchise Fee Schedule, including any applicable adjustments.

TERM OF CONTRACT:

The term of contract will be specific to each participating customer and set forth in the CARES CFE-ATC Customer Agreement.

Customers may elect to terminate participation under the CARES CFE-ATC program prior to the end of the CARES CFE-ATC Customer Agreement by providing written notice of the intent to terminate the Agreement to Georgia Power two years in advance of such termination. If a customer terminates its CARES CFE-ATC Customer Agreement prior to the end of the term, the customer's responsibility for compensating the Company for its damages associated with early termination, as determined in accordance with the customer's CARES CFE-ATC Agreement.

GENERAL TERMS AND CONDITIONS:

The charges and payments calculated under this tariff are subject to change in such an amount as may be amended and approved by the Georgia Public Service Commission. The Company reserves the right to terminate any or all contracts and this tariff at any time and without penalty, at the Company's discretion.

Service hereunder is subject to the Georgia Power Company Rules and Regulations for Electric Service on file with the Georgia Public Service Commission and as they may be amended from time to time.

If state or federal laws or regulations are instituted requiring Georgia Power to provide renewable resources, RECs, or otherwise meet a renewable compliance standard, the Company reserves the right to cancel all contracts and sales through this tariff and CARES CFE-ATC Customer Agreement, without penalty.