STATE OF GEORGIA

BEFORE THE
GEORGIA PUBLIC SERVICE COMMISSION

In Re:

Georgia Power Company's Application for the Certification of Capacity from the 2029-2031 All-Source RFP **Docket No. 56298**

In Re:

Georgia Power Company's Application for the Certification of Capacity Supplemental Resources **Docket No. 56310**

Hearing Room 110
244 Washington Street
Atlanta, Georgia

Tuesday, October 21, 2025

The hearing called to order, pursuant to Notice at 9:40 a.m.

PRESENT WERE:

JASON SHAW, Chairman
FITZ JOHNSON, Vice-Chairman
TIM ECHOLS, Commissioner
LAUREN "BUBBA" MCDONALD, Commissioner (Via Zoom)

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Jeffery R. Grubb				
M. Brandon Looney				
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P R O C E E D I N G S

CHAIRMAN SHAW: Good morning again. Thank y'all for being here, first of all. Welcome to the Commission and we will get started.

This is Docket No. 56298 and Docket No. 56310: Georgia Power Company's Application for Certification of the 2029 to 2031 All-Source Capacity RFP, and the Certification of Supplemental Resources for the 2028 to 2031 capacity. We will start by calling for appearances.

Georgia Public Service Commission.

MR. PAWLUK: Good morning, Commissioners. Justin Pawluk for the Public Interest Advocacy Staff.

CHAIRMAN SHAW: Good morning.

Georgia Power Company.

MS. PRYOR: Good morning, Commissioners. Allison Pryor, Steve Hewitson, and Brandon Marzo on behalf of Georgia Power Company.

CHAIRMAN SHAW: Georgia Association of Manufacturers.

MR. JONES: Good morning, Mr. Chairman. Clay Jones on behalf of GAM.

CHAIRMAN SHAW: Good morning, Mr. Jones.

Georgia Interfaith Power and Light.

MR. SHERRIER: Good morning, Commissioners. Bob Sherrier, Jennifer Whitfield, and Amitav Kimani on behalf of GIPL and SouthFace.

CHAIRMAN SHAW: Good morning, Mr. Sherrier.

Southern Alliance for Clean Energy and Sierra Club.

MS. ARIZA: Good morning, Commissioners Isabel Ariza on behalf of Sierra Club and SACE.

CHAIRMAN SHAW: Good morning.

Southern Renewable Energy Association.

MR. HOLMAN: Good morning, Chairman. Blan Holman.

Members of the Commission, Blan Holman here on behalf of the Southern Renewable Energy Association.

CHAIRMAN SHAW: Good to see you.

All right. We have a lot of folks who have taken the time to come down to the Commission this morning as public witnesses. So thank you all for taking the time and the initiative to come speak to us this morning. And we're going to go ahead and get started with that.

And I want to remind everybody, we've got -- I don't even think I've got all the sheets, but I'm

at three so far. And so we -- we do have a hearing to get to.

So we would love to just listen to you all day, but we're going to limit y'all to three minutes each and you're -- you'll be up on the board. You'll be able to see the time. So if you could please help us by speeding things along by following that, we would greatly appreciate it. But thank you for being here.

We're going to start going down the list with Lorraine Cochran-Johnson.

Good morning.

MS. REVELO: Good morning. So she's not here today and I'm here on her behalf. My name is Martha Revelo. I'm the Chief of Intergovernmental Affairs for DeKalb County, Georgia.

First and foremost, I just want to send greetings on behalf of Madam CEO to Commissioner Echols and Chairman Shaw. I thank you for being responsive and just ongoing conversations. We appreciate just being able to be open to DeKalb County as a whole. So thank you so much.

I would like to begin by reading a letter from her, if you don't mind. Dear members of the Georgia Public Service Commission, as Chief

Executive Officer of DeKalb County, Georgia, I would like to comment on behalf of DeKalb County and its citizens under Georgia Power's application found in Dockets 56298 and 56310.

As it relates to these applications, DeKalb County would like to emphasize its continuing commitment to green energy and sustainability. DeKalb County since for -- solidly responsible for growth and sustainable communities in which health of its citizens and its importance and its overriding concern. Sustainable green energy sources, such power, wind energy, hydropower and geothermal energy, biomass and ocean energy are all replenished naturally and produce little to no greenhouse gases; thus, making them legitimate alternatives to fossil fuels.

Moreover, DeKalb County is a community for which growth is undertaken in a responsible manner with concern in -- within the interests of its -- all of its citizens. As such, we would respectfully request that the Public Service Commission partner with communities, such as DeKalb County, to find solutions that are in the best interest of -- and of responsible and sustainable community growth for in its consideration of all

applications at the issue that we're currently facing.

We look forward to working with you towards the betterment of its citizens in DeKalb County and the remainder of Georgia.

Sincerely, Lorraine Cochran-Johnson.

CHAIRMAN SHAW: All right. Thank you, Ms. Revelo. And please give our regards to the CEO and we appreciate the letter.

And I'm going to start -- I'll start calling the next person in line when I call the next. That way they can be ready. And if you will -- some of these names are a little hard for me to read.

So, if you would, just please state your name when you get up here so you can correct me if I'm wrong. And if I am, I apologize.

Next is Brittany Burns, followed by Randy Hudson.

Brittany Burns. There you go. Hey, how you doing?

MS. BURNS: Hey, good morning.

CHAIRMAN SHAW: Good morning.

MS. BURNS: Good morning, Commissioners. And thank you for the opportunity to speak. My name is Brittany Burns.

And beyond any of my titles, I am a Georgia resident first, who is deeply concerned about the direction our state is heading when it comes to energy costs, and especially fossil fuel dependence. Across Georgia, families are struggling to keep up with skyrocketing utility bills. Month after month, we watch rates climb. Not because we're using more energy, but because of corporate decisions that prioritize profits over people.

For many working-class families, seniors and single parents, these bills mean choosing between keeping the lights on and putting food on the table, which you guys have heard over the years multiple times. That's not a sustainable or just energy system. I have personally had to choose between daycare and utilities, despite making more than the above-average Atlantan. Groceries and utilities. And, honestly, that's not progressive at all.

At the same time, Georgia has become a magnet for massive data center facilities that consume enormous amounts of electricity, often powered by fossil fuels. These centers strain our grid, drive up demand, and push costs onto everyday ratepayers.

Meanwhile, the companies behind them receive tax breaks and favorable deals, leaving Georgians to foot the bill and bear the environmental consequences.

The Public Utility -- I mean, Public Service Commission is supposed to regulate utilities for locals. Something's not right when you've seen a repeated pattern since 2022 where folks are saying: We cannot afford utilities. Yet, corporations are coming up here thanking y'all for continuing to help them and give them deals.

We know that burning fossil fuels harms our communities from the air we breathe, to the climate disasters we're already facing. But Georgia can do better. We have the opportunity to transition toward clean, affordable, renewable energy. Energy that creates jobs, protects our environment, and lower costs for family.

The PSC has power and responsibility to hold Georgia Power accountable, to stop approving unjustified rate increases, and to demand a plan that prioritizes people and the planet over profits. I urge you to stand with all the people of Georgia, not just the corporations draining our wallets and polluting our communities. Reject

further rate hikes, push for transparency, and hold these utilities accountable for a fair, clean and affordable energy future for us all.

We appreciate also the fact that you guys have said that you will freeze rates. And I did opt into that. However, my very next bill was over $200 more than what it was before. So, please, if you can find a way to regulate that, that would be amazing.

Again, my name is Brittany Burns. I'm a Georgia resident and I appreciate your time today.

CHAIRMAN SHAW: Thank you, Ms. Burns.

MS. BURNS: Thank you.

CHAIRMAN SHAW: Next is Randy Hudson, followed by Tyler Riddle.

Good morning.

MR. HUDSON: Thank you, Mr. Chairman. My name is Randy Hudson. It's an honor and a privilege to be here today to the Public Service Commission and make some comments relative to my continued support and appreciation to the Commission and particularly to Georgia Power.

I am a pecan farmer from South Georgia. I own and operate about 2,000 acres of pecans and also own Hudson Pecan Company. Our business, like

much of Georgia agriculture, depends upon having reliable electricity every hour of every day, 365 days a year. We literally run on electricity and diesel fuel. The absence of either is absolutely a tremendous disaster.

Hurricane Helene, as I don't have to tell you, was tragic to most all of eastern Georgia agriculture. Our community was no exception. On the morning of the hurricane, when we woke up, we had thousands of pecan trees -- personally had thousands of pecan trees on the ground. And our greatest concern was in our processing facility.

We buy, own and operate approximately 10 million pounds of pecans. And a significant portion of that is processed into pecan products. We had literally millions of dollars of chocolate-covered pecans ready to be shipped. And at the time that hurricane hit and we lost power, you just can't preserve chocolate for a very long period of time without losing it.

A couple of phone calls to some really good friends to try their best to help us get back online and almost within hours they started working on it. I cannot tell you the hours of work they put in, the diligency they put to get us back on

track. And I'll never, ever forgive -- I will always remember -- or forget -- how important it was and how quickly they reacted.

Georgia Power crews showed up quickly. What amazed me was their level of communication. They worked through unbelievable conditions, which -- with chainsaws and backhoes and broke poles and power lines down. But they worked through it.

Their active and dedicated response literally saved my business and I will forever be thankful. They kept our contracts intact. We were able to make our deliveries.

As a result of that, not only my own family, but many families that work for us -- and we employ nearly 100 employees -- could afford to have Christmas and make their payments. The people we rented from received their payments. And so as a result of that, millions of dollars went back into our small rural community.

That experience drove me to realize just how important it is to have reliable, dependable service. I would end by simply saying this: Georgia needs renewables, but we also need dependable service. We need dependable distribution. We need reserves, light poles, power

lines, transformers, whatever is necessary in order to do that.

And I would just say in -- from the bottom of my heart, and representing many, many farmers across southern Georgia, that you fund Georgia Power and -- and make sure that these products are available to us.

Thank you, sir. Appreciate your time.

CHAIRMAN SHAW: Thank you, Mr. Hudson, for taking the time to come up here from Irwin County.

Tyler Riddle is next, followed by the Honorable Carden Summers.

MR. RIDDLE: Good morning, Commissioners.

CHAIRMAN SHAW: Good morning.

MR. RIDDLE: I'd like to begin by thanking you for the opportunity to speak to you this morning. It is my honor.

My name is Tyler Riddle and I serve as Tift County Commissioner and as Chairman of the Tifton Urban Redevelopment Agency. In my free time, I own and operate MRS Homecare, a home medical equipment company with 15 locations throughout Georgia.

I wanted to speak to you this morning, both as a community servant and as a business owner, about the importance of Georgia Power's continued

investment in reliability and urban renewal. In downtown Tifton, we are in the middle of a major revitalization effort, bringing back life to legacy storefronts, improving housing, and creating a business environment that entrepreneurs want to invest in.

Georgia Power has been an active part of that work, not just in conversation and concept, but on the ground with us. They've helped modernize our aging infrastructure and our urban core, hardening lines, under-grounding where appropriate, and making the grid more resilient in areas that have struggled historically. And that matters.

As Dr. Hudson said, as you all know, south Georgia reliability is not an abstract concept. It's economic viability. It's whether a new restaurant opens or doesn't. And in my case, it's whether a healthcare provider can operate uninterrupted in the face of a natural disaster.

It's whether an aging parent can stay safely in their home with life-sustaining oxygen or home ventilation. In my business, I live this reality every day. A power outage isn't just an inconvenience; it's a matter of life and death.

And as we all know, storms in Georgia are

getting harder to deal with, not easier. So I want to be very clear to you, Commissioners, the work Georgia Power has done in Tifton and all over south Georgia is not cosmetic. It's foundational to our economic development, to housing, and to the literal health and safety of our most vulnerable residents.

I stand before you today in strong support of Georgia Power continuing their investment aggressively in reliability and grid modernization, especially in south Georgia's downtown and redevelopment zones, where that return on investment is transformational.

Thank you for the opportunity to speak to you this morning. And thank you for valuing the voices in our community.

CHAIRMAN SHAW: Thank you, Mr. Riddle.

Next is Senator from the 13th, Honorable Carden Summers, Chairman of the Banking Committee in the Senate, followed by Steve Taylor.

SENATOR SUMMERS: Good morning, Mr. Chairman.

CHAIRMAN SHAW: Good morning.

SENATOR SUMMERS: Good morning, Commissioners.

CHAIRMAN SHAW: Thank you for taking the time

to come before us.

SENATOR SUMMERS: You know, I needed to do this sooner and I apologize not being here earlier. But I come here today -- you know, it's not only as the Senator of the 13th District, but also as a citizen of my district and my area.

And I want you to know about Helene and the devastation. The 13th District was probably the hardest hit district in Georgia. If you -- if you could have imagined your wildest, wildest movie of -- of apocalyptic disaster, Coffee County, Irwin County, Berrien County shared that -- that look.

And I know -- where you're from, you understand what I'm saying.

CHAIRMAN SHAW: Oh, yes, sir.

SENATOR SUMMERS: It was -- it was unbelievable. And we started getting calls in the morning before daylight. And people were trying to explain to me what was going on. And you could not visually understand what they were trying to say until you put yourself in that spot.

You couldn't get to the towns. You couldn't drive to the towns. The only way you could get into a community is walk. Literally. I mean, there was trees down every 3 feet on cross-roads

for miles and miles and miles. Every power was down. Everything was a mound.

And I immediately -- immediately knew that nursing homes and hospitals, they couldn't be -- you know, we had Coffee County Hospital. They had to have the fire department come squirt water into chillers just to keep the air moving in the hospital. It was -- you know, the generators could not keep up.

And I immediately started calling my contacts with Georgia Power. And I want to, you know, give a shout-out to a gentleman named Don Porter, who has always been immediately trying to help.

And they immediately prioritized certain areas in our communities. And Georgia Power came in and with -- like what Mr. Hudson just said, with chainsaws, anything they could find, and started making way in these roads for people to get by.

It was the most devastating thing you'll ever imagine. But when Georgia Power came to the rescue and put up thousands of poles, thousands -- I mean, thousands of poles, these nursing homes, these assisted-living homes, these hospitals, these hospital -- where you -- where people can, you know, be seen at the doctor's offices, they got

them back online. They got them back online 24 hours a day.

We had people and our representatives -- you probably know them, but Mr. McDonald's son, they were bringing food down. Massive amounts of food just to feed these linemen and feed these people trying to help make a difference in our community.

And I think it was time to come give Georgia Power a shout-out for the -- for the -- for what -- their workers. I mean, their workers made all the difference in the world.

They didn't go home. They slept there in their trucks. They -- you know, they took a nap when they could and they worked 24/7. And I know you guys know that.

And Georgia Power needed a shout-out for this. And I wanted to come by and say a special thanks from my district, which is a massive district. I like to tell people I start in Crisp County and go almost to Miami, Florida.

It is a huge, huge district. And, you know, when I'm up here where most Senators can -- half a -- half of Gwinnett County or a portion of Gwinnett County. I cover nine big, major counties. And when I tell you they're big, they're huge

counties. One county is 73 miles from end to end, as you well know.

CHAIRMAN SHAW: Which one is that?

SENATOR SUMMERS: Worth. Worth County. And, you know, but when the -- when the hurricane came through and it shifted and twisted at Valdosta, I'm embarrassed to tell you when I woke up that morning, in Crisp County we didn't have a leaf down in our yard. And we thought we were going to be devastated. But everything basically to the east of us was in total disarray.

And I just want Georgia Power to know how much I appreciate the workers, the people, the corporate people, and the time they put in to make it happen and get us back online. They need to know that.

CHAIRMAN SHAW: Especially those linemen.

SENATOR SUMMERS: Absolutely. The line -- what's what I meant. The workers.

Thank you so much, guy. Thank you for what you do.

CHAIRMAN SHAW: Appreciate you. Thank you, Senator.

SENATOR SUMMERS: Thank you.

CHAIRMAN SHAW: All right. Steve Taylor,

followed by Peter Olson.

MR. TAYLOR: Thank you. Thank you, Commissioners, for having us this morning.

CHAIRMAN SHAW: Good morning.

MR. TAYLOR: I'm the sole Commissioner in Bartow County. It's the largest county in the country with a sole Commissioner form of government.

And I'm here to represent those citizens in our community that use a lot of Georgia Power. We're a pro-business community. If there's -- if there's a pro-business community in Georgia, I think you'll look at Bartow and you can say: You're it.

But we have just -- for instance, a couple of big companies has located in Bartow County in the past couple of years that employs 6,000 people. Both of those companies are big power users. But those 6,000 people are going to make a higher than average wage in Bartow County.

It's important to the blue collar folks in our county that -- that is making an hourly wage that's willing to get training and that -- we depend on those companies and those companies -- companies depend on Georgia Power.

Plant Bowen is one of the largest power plants in the eastern part of the United States and it sits right there in Bartow County. Plant Bowen employs a lot of people. It's important to our local community, as far as wages, good benefits.

And they are great corporate citizens. I've never -- I've been a Commissioner for 13 years and I've never had a corporate citizen as great as Georgia Power. You turn around and somebody's in that room, a charity, the local chamber. They're always there to support us.

I'm speaking -- I know we're talking about expanding Plant Bowen, but I'm speaking about a company that cares about the community, too. And so just on behalf of Bartow citizens, we know that Plant Bowen needs to expand.

Someone spoke about data centers. We've approved four already. There's another application coming. I'm personally not afraid of data centers. I've done research -- as much research, I think, as almost anybody. They're not noisy. I know social media says they are.

We require a closed-loop system. Not much water use at all. If they locate in Bartow, we control the water. It's not they control the --

our water. We control, as the local government, the amount of water that they use. So they're not going to be big water users if they locate in Bartow County.

So I am pro data center because I look at the revenue and I look at the average wage of those jobs that are coming. So just on behalf of the citizens of Bartow County, I am pro Georgia Power. They've been a great corporate citizen and I know that they need to expand that power plant.

Thank you for having us today.

CHAIRMAN SHAW: Thank you, Mr. Taylor. Thank you for your service and thank you for what you do for the folks in Bartow.

Next is Peter Olson, followed by Katie Gobbi.

MR. OLSON: Good morning, Commissioners. Peter Olson. I'm the County Administrator for Bartow County. I have served Commissioner Taylor for the last 13 years.

We appreciate the Public Service Commission and Georgia Power very much. As I watch other states suffer rolling brownouts and blackouts in dire situations, we appreciate the planning process that Georgia Power and y'all go through to plan for the future. So the future power demands have

exploded with data centers and other needs and we're fully in support of that.

In 2019, the RFP, we -- I read those things when they come out because Plant Bowen is our biggest taxpayer. And when it was going to shut down Plant Bowen, that was a great concern.

Come 2022 and now 2025, it's going the other direction, which is positive. The -- the All-Source RFP has two cogener- -- combined cycle, you know, natural gas turbines planned for Plant Bowen and 500 megawatts of battery storage.

So we appreciate all the efforts to, you know, increase renewable and sustainable power. But I think Texas and other states have shown you can't go all in on that too fast. You need a reliable 24/7 power supply.

So we're in full support. Georgia Power, as the Commissioner said, is a great public citizen. They -- their corporate -- their employees support all our charities, our homeless shelter, our food pantries. They're always there in an emergency. And so we appreciate that company as a corporate entity.

I mean, I -- you know, I hear a lot of people say negative things about corporations -- big

corporations. Georgia Power is made up of people and they've got great people that work for them.

So we were certainly glad -- you know, north Georgia is growing. Bartow is booming. Two more million people are predicted to move to Georgia in the next 20 years. Two million people just moved here in the last 20 years.

And the economy runs on power. So that's the job you guys got. Georgia Power does a great job of supplying their portion of that. And so we just wanted to come down and say we're in support of all the projects they've proposed for Bartow County in the RFP.

Thank you.

CHAIRMAN SHAW: Thank you, sir. Appreciate it.

Next is Katie Gobbi, followed by Jack Faunce.

MS. GOBBI: Good morning, Commissioners. My name is Katie Gobbi. I'm sorry for not writing legibly.

I serve as Community and Economic Development Director for the City of Euharlee in Bartow County. We are a growing community of nearly 5,000 residents. And thank you for this opportunity to speak on behalf of Georgia Power, a company that

has long been woven into the fabric of our city.

For decades, Georgia Power has provided reliable and resilient energy service to Euharlee and the surrounding region. Plant Bowen quite literally serves as the backdrop for all we do in our city and is a constant reminder of Georgia Power's deep roots and stability.

Their commitment to our community is not reflected -- it's not only reflected in the infrastructure they've helped build, but also in the heritage they've helped preserve. At the Euharlee Black Pioneer Cemetery, the resting place of more than 300 enslaved individuals and their descendants, Georgia Power employees have devoted countless hours to cleanup, preservation, and funding support. Their efforts have ensured that this sacred site, one of our city's most significant historical landmarks, is honored, protected and accessible for future generations.

The same spirit of partnership is evident in projects that shape Euharlee's future. When Osborne Park, one of our city parks, was first developed, Georgia Power's partnership helped construct recreational facilities that generations of families still enjoy.

Today that legacy continues as Georgia Power remains an active partner in ensuring that our community has the energy, capacity and reliability to match its growth. In the past four years alone, we've seen nearly 1,500 new residential units approved for development along Euharlee Road, our main corridor. And that's in multiple jurisdictions.

Our area has also experienced a steady rise in recreational tourism and event-driven visitation, welcoming tens of thousands of guests each year. Each new home, business and visitor increases the demand on our infrastructure, and that includes dependable power.

Georgia Power has worked to be proactive and prepared, investing in capacity, reliability and innovation so that communities like ours can sustain growth without compromising service. Their team works closely with our local government, as the Commissioner and Administrator said, developers and industries to ensure that as we grow the power grid grows with us.

Euharlee's story is one of steady growth and Georgia Power has been a partner at every step, anticipating what's ahead, rather than reacting

after the fact. Their long-term planning and local engagement ensure that our residents, schools and businesses can depend on consistent, safe and affordable energy. In short, Georgia Power doesn't just power Euharlee, they prepare Euharlee for what's next.

On behalf of the City of Euharlee, I want to thank Georgia Power for their continued investment, proactive leadership, and their commitment to meeting the needs of a growing Bartow County. And thank you all for the opportunity to speak.

CHAIRMAN SHAW: Thank you.

Jack Faunce, followed by Tom Bailey.

Good morning.

MR. FAUNCE: Hey, good morning, Commissioners and Chairman. Thanks for having me.

My name is Jack Faunce. I serve as a vice-president and head of procurement for supply chain for procurement for Flexential. Flexential is a leading data center, colocation, cloud and connectivity services company. I appreciate the opportunity to speak with you in support of Georgia Power's additional request for capacity.

Flexential has been operating data centers in Georgia since 2007, making us one of the early

contributors to the state's digital infrastructure economy. Over the last 17 years, we've grown, along with Georgia's technology, economy, invested in facilities, talents and partnership, and we continue to grow. Today we operate five data centers across Alpharetta, Norcross, and Douglasville. We are building our sixth data center right now in Douglasville.

These sites continue to support critical infrastructure, supporting hundreds of businesses, healthcare, financial services, logistics and AI development. In Georgia alone, we support 409 customers. We employ 76 Georgians with an average approximate salary of about $7 million a year in payroll. Additionally, in 2024, we paid -- our vendors exceeded spend of $118 million, which helps in the local economy.

These numbers reflect more than just an economic impact. They represent a growing demand of reliable, scaleable and sustainable power. Our customers are increasingly deploying high-density computing, AI workloads, hybrid cloud environments, and require significant and uninterrupted energy.

The request before you is not just meeting today's needs. It's about preparing Georgia for

the digital economy of tomorrow. Without additional capacity, Georgia risks losing a competitive edge and attracting data center driven initiatives and high-paying jobs that come along with them.

Flexential is committed to growing in Georgia. We hope to continue to expand our footprint in the state. And we urge the Commission to approve and remain a leader of the national digital infrastructure.

Thank you for your time.

CHAIRMAN SHAW: Thank you, sir.

Tom Bailey, followed by Elizabeth Moore.

Good morning.

MR. BAILEY: Good morning. Chairman Shaw and Commissioners, Tom Bailey. I'm the vice-president of energy for Flexential Corporation.

First off, just appreciate the work you all have ahead of you. Prior to Flexential, I spent 25 years in a regulated utility in the midwest and the south. So I understand the IRP process and what you have coming forth. But I really want to talk today about the importance of proper utility and regulatory framework and oversight.

Just a little bit of background, and I think

many of us are -- are familiar with this. The scale of infrastructure demand from AI data centers is unprecedented in modern U.S. history, rivaling the post-World War II electrification era.

Data center expansion is outpacing the utility sector's ability to respond due to some regulatory complexity and long approval times. In connection, the U.S. grid is aging. Some assets exceed 50 years.

And, also, I think we're all aware the interconnection queue is already backlogged for not only data centers, but on-shoring of manufacturing. States that maintain proactive regulatory environments, include streamlining permitting, accelerating commission approvals, and signaling openness to large-load projects will gain a competitive edge. Conversely, states with multiyear approval processes risk falling behind in the race for AI infrastructure investment.

Specific to Flexential data centers, we can build our data centers in under two years, but some utilities often take four to five years to deliver new generation and transmission. That mismatch, one of the most challenging -- is one of the most challenging realities shaping deployment.

Additionally, we also want to ensure proper financial recovery mechanisms which do not overburden or discriminate data centers from the remaining rate base. We believe in paying our fair share and we do across the U.S.

The grid challenge is twofold. One, power generation and infrastructure investment and transmission and distribution lines. Three key items for proper growth for regulatory consideration: Stabilize the grid, balance the retirement plan for current generation fleets with new generation to ensure proper transmission -- transition with no impact to spinning mass generation capacity.

Two, optimize the grid. Exploring ways to increase megawatt output. This includes integrating backup generation and enhancing load flexibility programs.

Also, we would like to consider how do we fast-track major transmission upgrades across the region, the state, and the U.S. that adds lines to existing infrastructure without concern for safety.

Finally, grow the grid. Flexential supports the expansion of all forms of generation, provided they're reliable, cost-effective and safe.

In conclusion, for support, we would ask that that the key items to support the projected AI growth will require five key items: Coordinated federal and state action, accelerated infrastructure investment, regulatory -- regulatory reform where applicable, strategic prioritization of regions with scaleable energy assets, and, finally, proper cost of service and oversight.

Thank you so much for having us today and really appreciate your time.

CHAIRMAN SHAW: Thank you, Mr. Bailey.

Elizabeth Moore, followed by Lizanne Moore.

MS. MOORE: I think that -- Lizanne and I are the same. That's what -- Lizanne is my other name.

CHAIRMAN SHAW: Oh, it was on here twice. Well, good.

MS. MOORE: Yeah. Sorry about that.

CHAIRMAN SHAW: How are you this morning?

MS. MOORE: I'm -- I'm good. I'm good. Thank you. Thank you for having us here. I appreciate it.

I have concerns about data centers. I also have concerns about electric generation. First off, I would like to thank Georgia Power as a citizen and as a Georgia citizen for consistently

doing their job. We do appreciate it.

Concerning the data centers, many of them, including Amazon, have green policies in place within their companies. I would like to see them uphold those green policies and use renewable energy whenever possible.

The data centers have huge, huge rooftops that would be extremely good for solar power and would reduce the load on the community. Also, I'd love to see the PSC follow the example of Texas and allow for power cutoffs of data centers during weather emergencies. That would be a -- really, really helpful to surrounding communities and the continuation of providing power to them.

And I -- I've been up here talking about this before. I would like to see our state remain competitive and relevant going into the future. And one of the ways we do that is to expand our use of renewables.

It helps to keep our population healthy. It helps to keep our economy healthy. So I would really love to see an expansion of renewables, especially solar.

We've got a really -- our state is really good for solar. And I think all of you know that.

So I would love to see that done.

And I think that's kind of about it. I'm about to run out of time. Thank you.

CHAIRMAN SHAW: Thank you. And you'll be happy to know there's about 4,000 new megawatts of solar planned.

MS. MOORE: Make it double.

CHAIRMAN SHAW: Good morning.

MS. FURMAN: Good morning. My name is Melora Furman and I vote and live in DeKalb County. And I belong to the Unitarian Universalist Congregation of Atlanta.

And I thank you for this opportunity to convey my concerns and the concerns of many other Georgians. My primary reason for being here today is to ask the Public Service Commission to delay your decision on the All-Source RFP until spring of 2026 to allow the newly-elected Commissioners a chance to give consideration to the plan. And I -- I think that it's reasonable to do so and I hope you feel the same way.

I'm also here today, as you might have guessed, because I believe that the only way Georgia can develop a viable energy future for the next generation and the generations that follow --

and that includes very digitally-oriented generations, as they are -- by increasing our use of clean, renewable energy, such as solar, geothermal, and, to some extent, wind, and especially solar.

And I don't know -- I have -- this is my first time here. But I'm sure other people have talked to you about the long-term environmental effects and health effects of burning coal and fossil fuels, like natural gas.

There are -- this is the thing. There are better practices right in front of us. Other states use significant amounts of renewable energy, including significant amounts of solar energy.

In Georgia, more investment should be put into developing affordable solar energy and on integrating solar energy with the existing power grid. Creating a clean, sustainable energy future is Georgia's future.

That's why it's so important that you, the members of the Public Service Commission, put all your considerable knowledge and influence into replacing current status quo methods of energy production with methods to produce and distribute clean, renewable energy.

Thank you for considering my comments.

CHAIRMAN SHAW: Thank you, Ms. Furman.

Next is Dr. Hayashi, followed by Bob James.

DR. HAYASHI: Good morning, Mr. Chairman, Commissioners and staff. I'm Dr. Konrad Hayashi. I'm a prior Navy captain. I've been a Georgia resident and here in -- actually DeKalb County since 2008, after completing my military service.

And basically I am here to express my strongest concerns and objections by my family, myself, as well as a number of our friends, regarding the proposed charges by Georgia Power to increase its rates and fees. Basically I've voted libertarian at different times and -- however, what I've seen, in terms of what I've read regarding Georgia Power, is that they have effectively socialized the fees and expenses, while privatizing the profits. And this includes the request for an excessive $15.7 billion rate and fee increase, which I have to say that when the PSC approved of a roughly 12 percent profit margin, including on things that are cost overruns, that's not exactly -- having a pure cost-plus option is not at all efficient. I would say it's wasteful.

Having been in government for a number of

years, I know how strong we try and eliminate waste. But when you have a cost-plus setup and you reward at a 12 percent rate any cost overruns and all infrastructure purchases, it -- there's no incentive for efficiency.

The normal profit and fee rates return on equity across the industry within the United States is about 9.5 percent. So since -- over the last decade, the -- Georgia Power has had the chance to get in excess of an additional about two and half percent profit per year. In addition, getting the profit on multiple billions in cost overruns for Plant Vogtle.

And as someone who has been here a number of years, I've paid about the full thousands of dollars that I've paid. Many people who, let's say, were also within the service, they moved and they had to pay the rate, but they didn't get any benefit.

Georgia Power has increased its rates six times in the last two years. And I would say that I would not want to reward inefficiency. And I ask you to adopt a more libertarian free market perspective.

Thank you.

CHAIRMAN SHAW: Thank you, Doctor.

Mr. Bob James, followed by Peter Hubbard.

MR. JAMES: Hello, Commissioners. It's good to see you again. My name is Bob James.

As a retired resident of Public Service Commission District 3 in Atlanta and a former IT programmer analyst at the CDC Federal Credit Union, I am dedicated to promoting state and national policies that embody responsible stewardship and offer hope for future generations. Thank you for helping keep our power utilities reliable.

Affordability continues to be a challenge under the present guidelines. I appreciate startups working to cut greenhouse gases, including those supporting nuclear energy, which is safe and emission-free, though it is costly and not flawless.

Over time, both technological advancements and prevailing trends have shifted. Evidence now suggests that distributive renewable energy sources provide superior cost-effectiveness compared to the significant capital investment and ongoing maintenance required for fossil fuel infrastructure, including methane-based systems.

A recent AJC opinion piece titled, "Georgia

Can Learn from Texas on Energy," highlights how the Electric -- Electric Reliability Council of Texas, ERCOT, operates a competitive energy market focused on performance, rather than monopoly control.

Spencer Frye, a State Representative from Athens, suggested that Georgia could achieve energy independence if the Public Service Commission required Georgia Power to adopt ERCOT's bidding process, or something like it, selecting bids from lowest to highest cost until demand is met. This approach rewards renewables, lowers costs, and improves reliability with batteries.

Times are changing. I am not an expert, as you well know, but I would suggest that the current structure of charging customers for the fuel so that stockholder profits are maintained needs to be altered. Should state law be amended, or can a determined Public Service Commissioner advocate for consumers by challenging current structures to enable cleaner, more affordable and reliable energy as storage options -- options, especially emerging ones like compressed air and batteries, become increasingly cost-effective?

This may be an opportunity for you to demonstrate your commitment to representing the

interests of the people ahead of the November 4th PSC election. But I also like the idea she just mentioned about waiting until after the election to actually run the -- approve the RFP.

With all due respect, though, I urge you to realize when it comes to affordability, we cannot afford to delay removing greenhouse gas emissions and lowering costs for our fellow customers, as especially was witnessed by this.

Thank you.

CHAIRMAN SHAW: Thank you, Mr. James. Good to see you.

Peter Hubbard, followed by Scott Presson.

Good morning.

MR. HUBBARD: Good morning, Chairman.

CHAIRMAN SHAW: Good morning.

MR. HUBBARD: My name is Peter Hubbard. And in this Public Service Commission hearing for Dockets 56298 and 56310, I rise to speak with grave concern regarding this massive, costly, and unnecessary expansion of fossil fuel power plants, mostly to serve data centers.

The total cost of this profligate expansion is more than $21 billion when including construction work in progress. That amount is

three times what Georgia Power Company added to our power bills with the expansion of Plant Vogtle. And the company is asking for certification now, instead of when these projects are completed so that these costs can be shifted as soon as possible onto the backs of hardworking Georgians, mostly to serve data centers.

Our power bills have skyrocketed as a result of the flawed decisions made here at this Commission. Approving these costly fossil fuel power plants would be yet another flawed decision that further increases residential power pills, mostly to serve data centers.

Just last year, Georgia Power Company said that the average residential bill would decrease by $3 per month. Before that, the company promised that Plant Vogtle, the expansion, would lower what we pay for power.

Instead, the average Georgia Power Company bill increased by more than $50 per month. This Commission then locked in those high bills with a so-called rate freeze.

But, you see, people pay bills. They don't pay rates. And we remember these broken promises every month when we pay a power bill that looks

increasingly like a car payment or even a mortgage payment, mostly to serve data centers.

Now, the company is extending the life of money losing coal plants to 2040, extending the life of harmful gas-fired power plants to 2050, and building brand-new fossil gas-fired power plants that they intend to operate for the next 40 years, mostly to serve data centers.

The people of Georgia are crying out for relief. They are being crushed under the weight of skyrocketing power bills and unnecessary fossil fuel power plants that poison our people and our planet. Also, that the profits may flow to the power company as they serve data centers.

This is not the Georgia Power Company Service Commission, nor the Data Center Service Commission. This is the Public Service Commission.

We, the people, implore you to serve the public interest and reject these harmful fossil fuel power plants in favor of low-cost and very reliable solar, batteries, load management, and other solutions that will truly lower power bills.

You have a choice, Commissioners. Please use your power wisely. Commissioner Shaw and Commissioner McDonald, I know that you have the

capacity to do the right thing for the people of Georgia and I look forward to working with you to lower our power bills.

Thank you.

CHAIRMAN SHAW: Thank you, Mr. Hubbard.

Next -- next is Scott Presson, followed by Neil Tellier.

Good morning.

MR. PRESSON: Good morning, Commissioners. I appreciate the opportunity to comment today.

We have exceeded the planet's capacity to absorb excess emissions from our burning of fossil fuels. From the historical upper level of 350 parts per million that had -- that had existed for at least 3 million years, we are now at about 420 parts per million. This is warming the planet, its atmosphere and oceans.

It was recently announced that we have exceeded one of the tipping points that scientists have warned us of. This tipping point is the coral reefs in the oceans that are hubs of marine life. The majority of heat from burning of fossil fuels has been absorbed by the ocean and the absorbed carbon dioxide has also increased the acidity of the ocean water, damaging marine, plant and animal

life.

Disasters across the globe, and here in the U.S., such as Hurricane Helene; flooding in areas, such as rural Alaska; wildfires in L.A., wiping out the Pacific Palisades, a beautiful area I once visited as a child; threat of extreme heat, and sea level rise. To me, there is no safe haven anymore here in the U.S. and beyond when it comes to global warming.

We need an orderly transition to truly clean, renewable energy on an accelerated schedule. I understand we can't stop the continued flow of greenhouse gases into the atmosphere and oceans in short order, but we can do a lot to reduce how much we are adding to the problem every day. The more we add, the more someone in the future will pay through suffering, poor health, and trying to deal with the costs of pulling the greenhouse gases out of the atmosphere and -- as well as paying for disaster relief and rebuilding.

I'd like to see the State of Georgia's leadership in joining other states in accelerating the transition to clean, renewable energy under the proposed RFP and supplemental. I think we have other better ways to generate electricity that

others have mentioned. Solar and battery storage are cheaper and can be built faster. Other efforts would include grid enhancements, wind power, distributed energy, geothermal, virtual power plants, et cetera.

I'd recommend the PSC not approve the continued use of the proposed coal plants and not approve the building of new methane gas generation, nor burning of oil. Later is too late. Let's stop adding to the problem daily.

Thank you for allowing me to comment.

CHAIRMAN SHAW: Yes, sir. Thank you.

Neil -- is it Tellier? I'm sorry about that. Followed by Marquis Solomon.

MR. TELLIER: Good morning. A lot of people get it wrong.

Good morning, Commissioners, and thank you for the opportunity to speak. My name is Reverend Neil Tellier from Hephzibah, Georgia. I'm with the Georgia Poor People's Campaign and Nonviolent Medicaid Army and pastor a congregation who are struggling to pay their power bills.

While I myself am not a Georgia Power customer, I am still affected by the choices made in this room. The Public Service Commission

doesn't just set rates for one company. It shapes the energy future for our entire state.

When the PSC approves massive new plants or billions in infrastructure, every Georgian feels it through higher costs -- sorry. My phone is acting crazy.

Right now the Commission is considering nearly 10 gigawatts of new power generation, more than has been requested, including 1.8 gigawatts, with no price tag or transparency. These projects aren't about meeting the needs of ordinary Georgians. They're about serving big tech companies.

Data centers drain local resources, using up to 5 million gallons of water a day, and they won't build where that need can't be met. While Georgia only gets 24 cents back for every dollar in tax.

And I'll say this plainly, I find it disingenuous to open up a meeting with the word of God and prayer while putting such a heavy load, such as adding $500 a year on average to what was an already high electric bill, on the least of these. Faith without justice is hollow. If we invoke God's name in these chambers, then our decisions should reflect God's concern for the

poor, the vulnerable, and those struggling just to keep the lights on.

We need the PSC to say no to unnecessary expansion, say yes to affordable clean energy, and to demand transparency so the public isn't left paying for corporate growth. Georgia needs investment in solar, battery storage and efficiency, not more giveaways.

Whether we live in Atlanta, Albany, Hephzibah, or rural north Georgia, we all want the same thing; safe, reliable, affordable power that sustains our homes and our future. It's time for the PSC to use its power for the people, not the powerful.

Thank you, Committee, for taking the time to listen.

CHAIRMAN SHAW: Yes, sir. Thank you.

Marquis Solomon, followed by Ronnie Andrews.

Good morning.

MR. SOLOMON: Good morning. Good morning.

My name is Marquis Solomon. I'm from Fort Valley, Georgia. That's in Peach County. Thank you all for the opportunity to speak with you this morning.

I'm the son of an aging mother on a fixed

income. I'm the father of two boys for whom I'm struggling to save as much of this planet for them as I can. I'm also a veteran and the grandson of a southern pecan and watermelon farmer. And I'm here to speak to you today about the importance of supporting clean and renewable energy initiatives.

Delaying support for low fuel cost renewables forces Georgia to rely more heavily on fossil fuels, particularly natural gas. Since the cost of natural gas fluctuates sharply with global markets and is passed directly to the consumers, citizens face higher and more volatile monthly electricity bills compared to systems powered by zero fuel cost. Wind and solar is what I'm speaking of.

And we, as a society, are struggling right now to hold on to every penny that we have. We should not have to choose between having heat and having to eat. Plus, coal and other fuels are dirty.

We residents of rural Georgia have a bad history with dirty power plants. Georgia needs cleaner energy now. Slow adaptation of clean energy means power generation continues to release higher levels of pollutants from burning fossil fuels. These increased air pollutions contribute

to higher rates of respiratory illnesses, such as asthma, cardiovascular diseases and premature deaths, particularly in frontline communities and our rural communities.

Lastly, it seems that being able to put on a suit and tie and stand up here and thank bigger companies is the thing to do right now and to give them their support is the thing that we should do. And I'm all for giving credit where credit is due. It's okay for us to support those companies.

But I'm more happy that the Public Service Commission supports the public. And I appreciate that. So I'm urging you to increase your efforts to transition Georgia to clean renewable energy, specifically wind and solar, to deliver lower, more sustainable utility bills for all Georgia citizens.

Thank you for your time and your service. Have a good day.

CHAIRMAN SHAW: Thank you for taking the time to come up from Peach County.

MR. SOLOMON: Peach County.

CHAIRMAN SHAW: Home of the -- home of the original Nu-Way weiners.

MS. MOORE: That's Macon.

CHAIRMAN SHAW: I thought the original was in

Fort Valley.

MR. SOLOMON: It was.

CHAIRMAN SHAW: Yep.

MS. MOORE: It was?

CHAIRMAN SHAW: Ronnie Andrews, good morning. Followed by Tierra Ragans.

MR. ANDREWS: Good morning.

CHAIRMAN SHAW: Good morning.

MR. ANDREWS: My name is Ronnie Andrews. I'm from Jones County, Georgia, Gray, Georgia, a small town.

The reason I'm here today is to ask you guys to decrease our mill. Let me tell you what I do and who I see every day. I'm a field agent underwriter for an insurance company and we deal with low-income every day.

They call us. And we don't go to those poor folks' houses trying to get money out of them. They call us because they got aged and they need a plan.

And one thing that they all have in common; their energy bill is killing them. There are other things now; grocery, healthcare, all crushing our peoples.

So when I get out there -- and I deal with

these people every day. I mean every day. You've got a poor old lady. It could be 65 degrees outside and they're still burning their furnace. Because if they're cold -- if their bones get cold, they can't do their daily tasks. So they -- they need this more than anybody when you sit down and you look at their plan.

Now, I'm here to ask you guys for one thing. First of all, thank you for listening. I know you guys are busy. I know you have tough decisions to make.

But these peoples have tough decisions to make almost every day. 63 degrees, still burning to keep their bones warm so they can do their daily tasks. These people have 400, $500 energy bills.

Now, I don't know what we can do to reduce those mill rates so these people can get -- have a break. With everything going on today, gas prices, groceries, just bills just to eat, we need some heroes somewhere in our politicians and the people we voted for. We need somebody to do something, even if it's not traditional.

If you do something for our peoples to show you -- to show that you care, like reducing the mill rate, I think you will be greatly rewarded.

And I think peoples of today will never forget that.

But as I go, I thank you guys. I know you have hard work to do. I know that's a lot. But when you're out here, when you're dealing with these peoples every day and they can't hardly put bread on the table, just think about that when you make decisions. Clean energy and the Lord be -- Lord be us.

Thank you. Thank you for listening.

CHAIRMAN SHAW: Appreciate you, Mr. Andrews.

Tierra Ragans, followed by Diedre Johnson.

Good morning.

MS. RAGANS: Greetings. Grand rising, Public Service Commission and the community at large. I am Tierra Ragans, a member of 9to5, and a resident from East Albany, Dougherty County.

I'm here to talk to you about the rising cost of utilities in Georgia, but specifically my community. People of my community are struggling to not only make ends meet, but specifically to pay the light bill.

As a working woman and mother of five boys, I want to explicitly say the utilities are way too high. My mother, who suffers with sciatic nerve,

chose not to retire due to her concern of not being able to pay her light bill. She is a senior in a single household facing light bills as high as $817.23 to $996.08.

And each -- and with each board member probably making double of what the average household income is, I'm sure you don't know or maybe don't understand our struggle. It's hard to understand how this body continues to approve actions that end up falling on ratepayers, increasing in the utilities. Yet, the cost of living has increased and minimum wage has not.

Due to these increases, families are having to combine their households just to be able to sustain, and not be threatened, to make ends meet. These are things I want to know -- I want you to know or expect you to know when making decisions around increasing a bill.

I urge you to reconsider the rate increase on the table. Georgia Power is for Georgia Power. Again, Georgia Power is for Georgia Power. But the Public Service Commission is for the public. And we need you to stand up.

Thank you for your service, for your time, and for your consideration. Thank you.

CHAIRMAN SHAW: Thank you. Thank you for coming up from Albany.

MS. RAGANS: Yes, sir.

CHAIRMAN SHAW: Diedre Johnson, followed by Deborah Moore.

Good morning.

MS. JOHNSON: Good morning all. Grand rising. I greet you from 9to5 in Albany, Georgia, Lee County.

And I've been listening today and I'm feeling a certain way, but I'm trying to hold it all in because you guys work for us. And I appreciate that. And I just want y'all to remember that as I speak.

I wish for this Commission to reduce the increasing cost of utilities in the Albany area. This Commission has allowed Georgia Power to increase costs to Georgia families by 33 percent in just the last two years. That's $500 per year.

The Georgia Power monopoly skewers 2.8 billion consumers. But like some of my fellow speakers have said, our costs don't reflect in your revenue. Forty percent of the earnings above 100 -- above the 11.9 percent that Georgia Power is allowed, it's supposed to be refunded.

However, they have been allowed to keep 20 percent of the profit. Forty percent is to pay for downed assets and liabilities, but the state decides how much is passed to consumers.

The air pollution from coal-fired power is linked to asthma, cancer. But I guess the 22 billion in profit from 2009 to 2023 matters more than the health of the consumers.

With the proposed hikes, 37 plus nursing homes and two hospitals are expected to close. Just on a personal level and food for thought, seniors are deciding between food, medicine and life.

Seeing how the average salary -- salary is 145,000 annually for Commissioners. But it shouldn't take an emergency to show compassion and concern for exhibiting everyday people, unlike profits. I choose people.

I thought the Public Service Commission worked for the people and not for the profit. But as you are on the board, you have the privilege to regulate utility bills. Please do so. People over profit.

CHAIRMAN SHAW: Deborah Moore, followed by Leila Meadows.

MS. MOORE: Good morning.

CHAIRMAN SHAW: Good morning.

MS. MOORE: It's my first time here. I'm a little nervous.

CHAIRMAN SHAW: It's your first time? Well, we welcome you.

MS. MOORE: Thank you. I'm a senior citizen. My name is Debbie Moore. I'm from -- I grew up in Bibb County, but I come from Baldwin and -- home of the Allman Brothers. And -- I have to say that.

I recently realized that we got a discount. I'm 70, but the discount started when we were 65. But I just found out about it when I turned 70. And I appreciate that.

It has helped me, you know, some, but not a lot. But it has. But it took five years for me to find out about it and I can't understand why.

But I live in low-income housing. I'm a senior citizen, single, widowed. I only get $31 in food stamps. My rent is going up next year, doubling what I make. Doubling what I make a month.

And I'm going to have to fit in utilities, food, other bills. I have car, gas, maintenance, my health, which I have very -- I've had three

heart attacks, I have four stents, I have blockages, I have cellular -- artery issues and I take over 15 medications.

And I would like if y'all could think about the senior citizens. I mean, it's not getting better for us. It's -- it's really -- it's getting worse for us because as we get older, we do get sicker.

You know, we inherited it or whatever. We did bad things because we were baby boomers. You know, we did bad things in the past or whatever. So, you know, that's probably why some of my health issues are so bad.

But, anyway, thank you for listening. And we do need some help. The -- I do live in senior housing and we do need some help with some things. I -- I do have to go to the food banks monthly. And $31 in food stamps is all I get.

And, you know, rent is fixing to be half than what I make. So I'm just asking for a little help for the seniors and the people of Georgia. We all need help.

Thank you.

CHAIRMAN SHAW: We've got Statesboro Blues; right?

MS. MOORE: That's how it is.

CHAIRMAN SHAW: All right. Ms. Leila Meadows, followed by Jamelle Hill.

Good morning.

MS. MEADOWS: Good morning. My name is Leila Meadows.

CHAIRMAN SHAW: I'm sorry.

MS. MEADOWS: That's okay. Everybody pronounces it different.

I am a senior citizen on a very tight budget. I live in Baldwin County and I'm a voting citizen. I voted ever since I could.

My problem is I received that discount that -- for low income on the George Power bill. Just started it. And it gets me a $33 discount every month. It still -- it still takes me two months to pay my entire bill right now at present rate.

So my dilemma is: How am I going to pay a higher rate? The food's going up. It has gone up. Gas, all utilities. Our water bill just went up $50 in our area.

And I live in a low-income senior housing for 55 and over. And everyone in that apartment complex has the same issues. We live in

energy-efficient apartments and we still have to call Overview or some type of church organization every month to ask for assistance to pay our utilities. And they don't have any assistance because it's all gone.

Our whole community is suffering from the same problems. The food bank line is out the door. You have to wait three hours just to get a ticket to get a box of food.

So our problem this winter and in upcoming winters is going to be: Are we going to eat or are we going to heat? And we have a problem. We've got to get some help.

We have no jobs available in Milledgeville for -- that make any kind of money that's able to afford this. I'm not ashamed to say my yearly salary is 16,000. My -- and I'm a retired nurse.

My apartment building rent on low income is fixing to be $750 a month for one bedroom. I am housing my grandchild, my son and his fiance and me in a one bedroom so we can make it.

We're all working. We're on food stamps and we're paying our bills the best we can. We're just asking this Commission to help us a little bit better.

Thank you.

CHAIRMAN SHAW: Thank you, ma'am.

Jamelle Hill, followed by Avery Dobson.

MS. HILL: Thank you so much. My name is Jamelle Hill. And I am from the Macon/Warner Robins area. But I'm actually from Perry, Georgia, so I'm going to claim Perry.

CHAIRMAN SHAW: Houston County.

MS. HILL: Yes. Absolutely.

And I'm going to start out by saying: Thank you for your accountability when you were talking about baby boomers and what may have happened in the past. But with the Poor People's Campaign, we believe that everybody has a right to live. So regardless of where you are or where you've been, everybody has a right to live.

Again, good morning, Commissioners, and thank you for allowing public comment today. I'm speaking today as a Georgia resident concerned about industrial expansion. Specifically, I have a master's degree in public health. And so, for me, I'm looking at the effect on our environment, our water and our communities.

I heard the gentleman mention earlier today that when there's a closed-loop system that is

better for the community. And I think it's -- it's often misleading when you say there's -- it's better here, but you don't mention the other things that come with it. You don't mention the tax rates, you don't mention how the -- the tax rate will go up for homes. And so I think it's just very misleading.

And I want to say that when corporations profit from Georgia's resources, they also bear a responsibility to protect them. Yet, time and time again we see pollution, groundwater contamination, and increased energy demand with no direct accountability to the people who live with the consequences.

And so I'm asking this Commission to consider regulations that make companies responsible for restoring what they damage, not just paying fines or walking away. That could mean installing or funding water filtration systems in affected neighborhoods, providing public water fountains or refill stations where contamination has occurred, offering compensation and community investment when environmental harm or increased energy costs fall on local residents. Because environmental justice means making right the wrongs, not waiting for

federal agencies or lawsuits to do it years later. I think of cigarettes and the effect that it had on Americans.

It means recognizing that public health is preventative and not reactive. And that prevention starts with holding companies accountable for their footprint from the start. Again, I'm asking for regulations from you all. You have the power to set that standard here in Georgia to ensure that economic growth never comes at the cost of clean water, our health, our air, or our communities, our children, who are our future.

Thank you for your time and thank you for listening to the people most impacted by these decisions.

CHAIRMAN SHAW: Thank you for taking the time.

Avery Dobson, followed by Patty Durand.

MS. DOBSON: Good morning. I'm Avery Dobson and I'm here from Chatham County.

I would like to say that the six rate increases have caused a lot of stress on me and my friends. We live on a fixed income. And I feel that the PCS is not working or considering us. Please note your decision affect our lives.

Thank you very much. Have a blessed day.

CHAIRMAN SHAW: Thank you, ma'am.

Patty Durand, followed by Jace Cooksey.

MS. DURAND: Good morning, Commissioners.

CHAIRMAN SHAW: Good morning.

MS. DURAND: Today you are holding public hearings to address Georgia Power's request to certify $15.66 billion in estimated costs to expand Georgia Power's grid for data centers. It is unfathomable to me why anyone listens to Georgia Power's lawyers, staff, or witnesses about anything. Their claims about costs and demand growth have no credibility because nothing they've said in the past has proven even close to true.

For example, Georgia Power said two new reactors at Plant Vogtle would cost $14 billion and take seven years to build. They cost twice that much and took twice that long. That is an enormous failure.

Georgia Power said rate impacts for Vogtle would only be 2 to 3 percent. Last May, residential rates increased 25 percent, the largest rate increase in state history. Plant Vogtle is now devastating ratepayers with car payment size electricity bills, while delivering a delicious

$2.5 billion in profits to Georgia Power in 2024. And now Georgia Power's choice to use expensive gas to power data centers is even worse.

2024 was the warmest year in Earth's recorded history. And last September's Hurricane Helene was the most destructive storm in state history. In early 2026, Georgia Power customers will see a major rate hike -- ignore the faux Trojan horse rate freeze -- to pay for grid repairs from that storm, while Georgia Power simultaneously expands fossil fuels that are driving these disasters.

But we know why they are choosing gas, don't we? It's because Southern Company has five gas affiliates, all of whom profit from gas. So gas it is.

Never mind that solar and storage is ten times less expensive than gas. Never mind that both solar panels and battery storage systems are manufactured in Georgia, while you force customers to pay -- overpay billions of dollars to ship gas into the state, which we don't produce.

It is immoral for you to take tens of thousands of dollars from Troutman Pepper lawyer Allison Pryor, Steve Hewitson and Brandon Marzo in money while they sit here with a billion-dollar

case proceeding before you representing Georgia Power. There is no court in the land that would allow that kind of corruption to go on and I have no idea why the State of Georgia does. And I have no idea why the State Bar of Georgia does not sanction these lawyers for doing that. It is immoral and it is wrong and our leaders fail us.

You fail us, too. Besides the 25 percent rate increase for Vogtle, which delivered those profits to Georgia Power, you voted to approve a wildly expensive biomass plant last year saying that it would help jobs for timber companies. And you voted to approve this massive gas expansion for data centers just in July of this year.

We've had no apology from you about your nuclear boosterism costing us a 25 percent rate increase, nor an apology from Georgia Power for being so wrong about Vogtle. I urge you to make that apology and to require them to, as well.

I urge you to commit to declining this 15.66-billion gas-expansion certification request. Because we get to vote, too, and we don't like what we see.

CHAIRMAN SHAW: Jace Cooksey, followed by Ava -- Ava Trachtenberg.

Please correct me if I misspoke.

MR. COOKSEY: Good morning, Commissioners. My name is Jace Cooksey from Jessup, Georgia. And while I know you have not and will not remember my name, face or comments, I have returned yet again to speak before you on behalf of my generation and my fellow rural Georgians.

CHAIRMAN SHAW: I do remember. I remember you because -- when you said Jessup. I remember that. You don't hear that every day. Wayne County.

MR. COOKSEY: When you leave this hearing today, you'll have heard a series of comments from students, civilians, and many others regarding your RFP, which seeks to expand Georgia's electrical grid by another 60 percent strictly by furthering fossil fuel infrastructure, all with the intent to yet again shift the cost onto the constituents you say you claim to represent.

You're leaving -- halfheartedly listened to the upset of Georgians and the ruination that will follow the presence of data centers, like the tens of millions of gallons of water they will steal daily from the communities you have never considered to be more than rest stops on your

vacations. You'll exit this building having scoffed at the fears the weight of your decisions have placed on our most vulnerable communities through your grabs for profit, as the only Commissioners of the fifth most expensive electrical rates in the entire country. And, yet, as you have shown us repeatedly, you will rest easy upon the mounds of personal profit you have used to justify your passivity. Unlike the five of you, I refuse to follow suit.

Mr. Echols, I happened to be in the meeting in which you spoke to us students of Sunrise Emory, more specifically as one of the few rural Georgians that were able to attend. I sat by silently and listened to you and your disregard for the next generation while you plugged your children's book and wrote on whiteboards to explain why you've chosen to treat us Georgians as nothing more than collateral. And I bit my tongue as you talked down to each of us with a veil of antiquated, hollow, greenwashing you built a campaign upon.

So now I'm speaking to you and your constituents regarding your choice to choose data centers and blank checks over your own constituents. You each speak of service with

careers built on the backs of those who can't afford your choices. As we have heard already, the plans you approve and the partnerships you defend leave families across this state with bills equivalent to car payments just to keep the lights on. You have regularly traded the well-being of working families for campaign donations and a pat on the back from corporate execs who will never live with the fallout of your choices.

You could have chosen to invest in sustainability and clean jobs and a future that keeps Georgians healthy, housed, and helpful, but you have, instead, chosen once more to raise bills and call it progress. You've sold our future to Georgia Power and called it service, while ignoring the cries for help from your own districts.

So as I step away from this podium, I will not be offering thanks, well-wishes, or even a polite farewell. Respect is earned through integrity, not demanded through the offices you've used to abandon the people you call your neighbors.

Instead, I leave you with this: My statements here this morning may be forgotten, but the damage you leave in your wake will not. Your legacy as our Commissioners will go with the

same -- will not go with the same passivity you each act with. It will live on in every Georgian who has been and will be forced to ration their paychecks, close their businesses and make the choice between heated homes or dinner on the table.

We, the people of Georgia, will be left to remember every dollar stolen, every family abandoned, and your every blaring second of silence without the luxury to ignore reality as you five have. So when the comfort of your positions runs dry, I hope you, too, feel the weight of the reality you have sown for us citizens of the same state you left behind.

CHAIRMAN SHAW: Ava Trachtenberg, followed by Harper Dodson.

MS. TRACHTENBERG: Good morning, everyone.

CHAIRMAN SHAW: Good morning.

MS. TRACHTENBERG: My name is Ava and I'm here today with many of my friends and classmates, as you've heard, not because we believe that you care what we have to say. In fact, I know you don't care about us.

I know you couldn't care less about our generation; the burning future that you're handing us. I know you couldn't care less about your

constituents; the one your job compels you to protect from a reckless corporate monopoly.

If you did care about us, you would never consider approving this RFP, which amounts to the biggest expansion of fossil fuels in the country by any state or utility. Ten gigawatts of largely methane gas to serve data centers that don't yet exist and many that never will.

You would acknowledge that this fossil fuel expansion is a scam, a fraud, a way of extracting billions in profit from already energy-burdened customers by building expensive gas plants that we don't need, passing the costs on to customers and profiting off every dollar.

We know how it works. Georgia Power is guaranteed a return on equity for everything they build by state law. The more they build, the more they make. Plant Vogtle, the most expensive power plant ever built on Earth, earned Georgia Power a record $2.5 billion in profits in 2024. And it raised customers' rates by almost 25 percent.

Now, by massively over-projecting data center demand, Georgia Power is trying to expand the grid by 60 percent in five years. These gas plants are supposed to be online for 45 years. That's 2070.

Unless we transition away from fossil fuels as fast as possible, we're on track for around 3 degrees of warming by the end of the century. That is an unliveable future. That is an unliveable economy. It's an unliveable planet.

God willing, in 2070, we won't still be burning methane gas. So why would Georgia Power build gas plants that will become stranded assets? Because customers take on the risk.

Already Georgia Power bills are the fifth highest in the nation. These energy bills are actually keeping people in poverty. This $1566-billion RFP is a death sentence for our bills and our planet. And energy experts estimate that it will likely cost more like $22 billion or more when you account for the redacted columns and transmission lines required.

So why would you even consider approving this plan? Maybe, as Patty Durand showed us, it's because Georgia Power's lawyers have generously gifted you thousands of dollars. Thank you guys so much.

Maybe, Tim and Fitz, it's because 74 percent and 86 percent of your campaign donations, respectively, come from companies and people that

might just profit from your decisions. And it's great to see that only two out of five Commissioners are actually here in person listening to people today.

So I know you don't care what we have to say. I know you don't care about our future. You've shown that again and again.

Tim Echols, when you spoke to us last spring, you said, quote: 1, 2, 3 degrees of warming, whatever, that's not in my lane.

In reality, our future is in your hands. And we're here to tell you that people are watching. This robbery of our planet and our pocketbooks will not go unnoticed. Either step up or prepare to step down. Georgia is watching.

CHAIRMAN SHAW: Harper Dodson, followed by Andreea Trifas -- Trifas.

MS. DODSON: Good morning, Commissioners. My name is Harper and I'm a student from Emory University.

I was born and raised in Atlanta and I'm here this morning because I know just how much Georgia has to offer. Georgia is rich in wildlife, natural beauty, culture, and diverse people. And you, as Commissioners, have been elected to oversee our

energy needs, to regulate Georgia Power, and to ensure fair rates and reliable service for Georgia Power customers.

We Georgians rely on you to shoulder these responsibilities with our best interests at heart. And, yet, since 2023, you've approved six increases in the cost of utility bills for Georgia Power customers to fund the expansion of nuclear reactors at Plant Vogtle.

You approved these increases, despite cheaper alternatives being available. According to news sources, Plant Vogtle may be the most expensive power plant on Earth. When Plant Vogtle's new reactors were completed, Georgia Power implemented a 23.7 percent rate increase in energy bills, the largest in state history.

This increase, according to nonprofit sources, triggered disconnections as Georgians struggle to pay their electricity bills, which are among the highest in the nation. My family remembers these increases.

We also remember the impact that Hurricane Helene had on Georgia last year. We remember the Georgia Power outages, the fatalities and the devastation across South Georgia. Extreme weather

events, like Helene, are more frequent and more powerful because of global warming. Industrial processes and burning fossil fuels accelerate global warming and extreme weather events. Approving this RFP, the biggest expansion of fossil fuels in the United States, will intensify these harms, leaving young people to deal with the fallout.

Renewable energy is long overdue in Georgia. Big corporations stand to profit from this Commission's decision to keep renewable energy out of Georgia. And Commissioners stand to benefit from the campaign donations of big corporations, while Georgians bear the brunt of utility rate increases and severe climate events.

As voters -- as voters of Georgia, we need sustainable energy now. We need Public Service Commissioners who put young people first, who put our fellow Georgians first, and who put our planet first. This November we will vote for Public Service Commissioners who reject this RFP. Georgia is watching.

CHAIRMAN SHAW: Andreea Trifas, followed by Lily Xie.

MS. TRIFAS: Good morning, Commissioners.

CHAIRMAN SHAW: Good morning.

MS. TRIFAS: My name is Andreea Trifas. I am 19 years old and I am a student at Emory University.

I may have only moved to Georgia roughly three months ago; however, these issues that my fellow citizens have spoken out about are not unique to the state. In my neighboring home state of Alabama, Southern Power Company, Georgia Power's parent company, has been hiking up the power bills of working-class Americans ever since Alabama's energy systems were consolidated into private hands. Access to reliable power is a necessity. Yet, at the hands of corporations, like Southern Power Company, it's been transformed into a luxury.

In 2024, the Southern Power Company monopoly raked in 4.4 billion, with a "B", dollars in profit. The profits that line their stakeholders' pockets come directly from hiking up our power bills. However, these hikes are not supposed to go unchecked. The Public Service Commission has the duty of approving these very rate increases and regulating power companies, making sure profit machine monopolies do not infringe upon something as essential to everyday life as affordable energy

access.

I am here today simply to remind you all that this is your job. And despite what these bootlickers have said here today, the public knows that you have failed the millions of Georgians that you are supposed to serve in pursuit of your own greed and self-interests by continuously approving these rate hikes.

Moreover, on top of affordability, it's also your job to ensure that Georgians have access to safe energy. This includes, but is not limited to, your decision to approve Georgia Power's RFP, which includes a massive, inhumane expansion of fossil fuels in the form of three new gas plants and a mere inconsequential footnote on renewable energy.

We are easily catapulting past every single global warming benchmark that we have ever set. Considering this, why would it be a remotely good idea to create more power plants that are historically and scientifically proven to contaminate local communities and warm the climate? This proposal endangers my life, your children's lives, and the very existence of everyone on this planet.

Georgia has a real opportunity to stand up

for its citizens by standing against the tyranny of the Southern Power Company and becoming the region's leader in clean, safe, and renewable energy. And if you all were effective Commissioners, you would do your job and reject this RFP.

To conclude, I want to read a Georgia Power review from Consumer Affairs written by a pastor, who is from Stone Mountain. He said: Georgia Power does not care about their customers even if they are sick. They give no room to help you. They are a wicked, greedy company. And why does the State of Georgia have no care about the people in this state?

You have failed at your job and you have caused irreversible damage to our climate, as well as to the livelihoods of your constituents and the honest people living in the South. Georgia's watching.

CHAIRMAN SHAW: Lily, good morning.

Followed by Piper Domsch.

MS. XIE: Good morning, Commissioners.

CHAIRMAN SHAW: Good morning.

MS. XIE: My name is Lily Xie and I'm here today because I want to remind you of the

implications that your actions will have. I say remind because you know what will happen if you approve the RFP.

You know that you're leaving your children to face the consequences of climate change. You know the inevitable increase in energy bills that will follow. And you know that this isn't the right thing. So why are you even considering the RFP anyway?

Well, I'd like to point out that the Troutman Pepper law firm representing Georgia Power has donated $10,000 to Tim Echols, $10,000 to Fitz Johnson, who isn't here right now, and $15,000 to Tricia Pridemore, who should be on Zoom but is not, since 2023.

For these personal gains, you have neglected your duty to keep energy affordable, accessible and safe for Georgians. Plant Vogtle has already added $7.5 billion to the rate base and increased energy bills by 25 percent.

A further 15-plus billion-dollar expansion, which is double that of Plant Vogtle, will end affordable energy in Georgia. Approval of the RFP will be taking money from the people's pockets and putting it into Georgia Power's and into yours.

But I assure you, your -- your money will give you no respite when your children, ambitious youth like us, are confronted with natural disasters, even worse than Hurricane Helene that threaten their survival and make it impossible for them to flourish.

I mean, how can we flourish when we not only need to worry about respiratory problems and even cancer from particles released by burning methane, but also about constant rebuilding after disasters, such as Hurricane Helene?

By approving the RFP, you are betraying us young people and you are betraying our future. Yet, it is so easy to do better. Solar energy is one of the cheapest, safest and most ethical energy sources out there. And despite being one of the sunniest states, Georgia is among the bottom five states, in terms of residential solar installations per capita.

In contrast, the neighboring state of Texas -- of Florida, pardon, has more than 15 times the number of solar installations per capita than Georgia. Your prioritization of profit over the health, money and future of your constituents is crystal clear. Georgia is watching and we will be

voting.

CHAIRMAN SHAW: Piper Domsch, followed by Shumin Liu.

MS. DOMSCH: Good morning, Commissioners. My name is Piper Domsch. I'm a registered Georgia voter and I'm here today because it's time for you all to take responsibility for the fact that you are choosing profits over the lives and futures of people in this state, especially young people like us.

This July 4th, three 8-year-old girls from my neighborhood were lost to the devastating flooding at Camp Mystic in central Texas. This loss thrust my community not just into unimaginable grief, but unimaginable anger, because we know the extent of this flood devastation was preventable.

Climate scientists have explained how rising temperatures intensified the rainfall that caused the flash flood. And how these events will only increase in frequency as we continue to rely on fossil fuels and continue our path towards 3 degrees of warming.

You may think this type of event is unique to Texas's ecosystem, but believe scientists when they tell you that Georgia is next. Climate Central

found in a study from April that over 1,000 square miles of land in Georgia lies at risk of a severe flood by 2050 as sea levels continue to rise amid global warming. These miles are home to 24,000 people.

Although we know you don't care about your constituents as a whole, consider for a moment how you would feel if your children or grandchildren were swept away from their summer camps in the middle of the night, and you chose throughout your entire career not to do anything meaningful to prevent it. Let us also remember that 37 Georgians died from Hurricane Helene last September.

Yes, extreme weather events have always existed, but because you all insist on sticking your head in the sand when it comes to matters of the environment, you are making these extreme weather events more frequent and more devastating. How many more Georgians will have to endure the effects of these events before you actually do something about it?

This RFP aims to increase the capacity of our energy grid by 60 percent over the next five years. Solar only makes up 4.3 percent of the total increase. And three of these gas plants are set to

run for 45 years. This would mean that when all of the young people in this room are in our 60s, these plants will still be running.

There's predicted to be 1.2 billion climate refugees by 2050. This plan would have these gas plants running for another 20 years after this date. Of course, you know that these plants will become stranded assets. But, in the meantime, you all are creating a world that is genuinely unliveable all so that you can remain in the pocket of Georgia Power's lawyers.

Approving this RFP means you all are, once and for all, choosing your own profits over the actual lives of your constituents. When Tim Echols came to speak with us, he told us that he didn't see climate change as being in his lane.

Interesting how you can't see helping the environment as being in your lane. But since you all are the people making the choice to approve this unprecedented grid expansion, you seem more than happy for harming the environment to be in your lane. Whether or not you believe in climate science, your approval of this RFP will make deadly natural disasters more frequent and more devastating.

Georgia is watching. So think long and hard about whether this corrupt money is worth it to you. And if it is, prepare to be voted out.

CHAIRMAN SHAW: Shumin Liu, followed by Rebecca Lesser.

MS. LIU: Good morning, Commissioners. My name is Shumin Liu and I speak today as a part of the larger Emory community.

I am an Australian citizen, but I will be living here for the next four years. And I am affected by the decisions that's made in this room. I'm already developing a love for this city and I'm not going to just watch it rot because of Georgia Power.

I have a deep love for scuba diving. When I'm in the water, I witness firsthand the impact our species having on the others. I've seen the bleaching in the Great Barrier Reef with my own eyes. By approving this RFP, you are contributing to more coral bleaching around the world.

Your decision impacts places both globally and locally here in Atlanta, in Georgia. Climate change is happening right here right now. Fifty-eight species of Georgia's 254 bird species are vulnerable to climate change across seasons.

A rapidly changing climate could lead to population decline and local extinction. We co-occupy the Earth together with other species and we need to be responsible for our decisions and our actions. You have the power to minimize our impact on the other species.

You, the Commissioners, have the responsibility to lead Georgia toward sustainable renewable energy. You have the opportunity to make a real change. By rejecting this RFP and halting the expansion of fossil fuel, you can send a powerful message that Georgia refuses to compromise the future for the sake of profit.

This is not just a political issue. It's a moral one. It's about doing what's right for our community and our planet.

I urge you to reconsider approving this RFP and listen to the people who are calling for a just, sustainable energy future. Georgia is watching.

CHAIRMAN SHAW: Rebecca Lesser, followed by Maya Vizvete.

MS. LESSER: Good morning. I'm Rebecca Lesser and I'm a student at Emory University.

Ever since I was little, my parents have

taught me to live by the saying: It takes a village. We, as a community, must come together to support one another and ensure that the world that we bring the next generations into is one that can sustain them.

I was nervous to leave my hometown in south Florida, to leave my village, and come to school in Atlanta. But after moving to Georgia, I've seen the warmth, kindness, and compassion of the people here.

Georgians have shown me the strength of their village; their care for each other, their optimism and their commitment to community. But they've also shown me their struggles; how it's becoming harder to afford daily life, how worsening air quality has hurt their health, and how much has changed in just the past few years.

Commissioners, Georgians rely on you to protect their well-being, to make sure that Georgia Power's decisions lead to their prosperity, not their peril. To protect the citizens you were elected to serve, you must not approve this RFP.

Electricity bills in Georgia are already the fifth highest in the nation. Plant Vogtle alone caused a nearly 25 percent rate increase after its

completion in 2023 and 2024, a project that ballooned from $14 billion to nearly $36 billion.

This proposed $10,000 -- 10,000-megawatt expansion is estimated to cost $15 billion, but could reach between 20 and $25 billion, putting even more financial strain on families who are already struggling. And the costs for Hurricane Helene haven't even been factored in yet. Georgia Power customers already owe nearly $1 billion from that alone. This RFP would be an unbearable burden on the people of Georgia.

On top of the vast financial issues that result from the approval of this RFP, there are also various health concerns linked to it. According to the American Lung Association, Georgia's air quality has been worsening. In fact, Atlanta is the third worst metro area in the southeast, in terms of ground-level ozone pollution.

About 60 percent of the proposed expansion relies on burning methane gas, which releases pollutants, like ozone, nitrogen dioxide and fine particulate matter. These pollutants cause asthma, lung damage, and even cancer. Methane itself is also one of the most potent greenhouse gases, with

80 times the warming power of carbon dioxide, worsening climate change and threatening future generations.

Commissioners, it truly does take a village to protect our future. In my short time here, I've seen how special Georgians are and I'm proud to call this state home. But every member of the village must do their part.

As Commissioners, and as members of this beautiful Georgia village, your duty is to protect it, to serve your people. You must reject this RFP. Protect your village and protect its future. Georgia is watching.

CHAIRMAN SHAW: Maya Vizvete, followed by Carter Douglas Brown.

MS. VIZVETE: Hello. My name is Maya Vizvete and I'm here today because this summer my hometown was flooded. My close friend lost her car to damages and practically swam through a parking lot after clocking out of her shift to get to safety. Local businesses were destroyed. Hundreds of people needed to be rescued and six people lost their lives.

This happened not even a year after Hurricane Helene devastated our neighboring communities.

People who fled their homes after Helene quickly re-experienced that same climate displacement and fear. This has become their new normal and that future is here.

I'm here today because people cannot be treated as externalities. As climate change intensifies at the hands of oil and gas and your inaction, Georgia Power continues to profit off the spoils. Georgia Power makes more profit per customer than any other utility. Georgia Power's CEO's compensation is larger than any other utility.

As the company's profit venture is powered on fossil fuels, compound on energy bills, as the consumer pays ridiculous amounts for utility with one of the highest disconnect rates in the country, you and Georgia Power contribute to emissions that accelerate the destruction of their homes, the displacement of their communities.

In this way, this RFP is no different. Nearly 80 percent of proposed additions would be built and owned by Georgia Power, or purchased from existing plants owned by its company, Southern -- owned by its parent Southern Company.

Ninety percent of this expansion is to serve

data centers. These soon-to-be stranded assets not only threaten the safety of residents through energy poverty, but through direct harm on their neighboring communities. Communities near data centers have reported huge amounts of noise pollution, decreased access to water and increased water pollution, increases in light pollution and more. The effect is unknown.

No matter the cost of this under-budgeted energy expansion, local populations will continue to face this strain on their local resources and daily lives. The rest of Georgia will face bills increasing to the scale of car payments in a state that already has the fifth highest electricity bills in the country and unacceptable rates of energy burden. People must always be valued over data centers.

I'm here, even though none of you care what I have to say to you. You don't care about the personal stories we are sharing. You don't care about our futures. You don't care about vulnerable populations or the residents you pretend to represent. In fact, only two of you are even here to sit and listen to me say this to your face.

When Tim Echols came to speak with us last

spring, you stated that climate change was not a threat to Georgia. Tell that to the families of the 37 Georgians who lost their lives to Hurricane Helene. Tell that to those displaced after flooding events. Tell that to families pushed into poverty because of rising energy bills.

That future is now and that future is here in Georgia. Your constituents know this because we can feel it. We will express this at the polls and vote you out of your seats. Georgia is watching you.

CHAIRMAN SHAW: Carter Douglas Brown, followed by Eden Zebrak.

MS. BROWN: Good morning, Commissioners. My name is Carter Douglas Brown. I'm an Emory student and I've lived in Georgia my entire life.

I've grown up surrounded by the beauty of this state; its rivers, its mountains, and its incredible communities. The love I have for this state runs deep. And it is that love that brings me here today to defend it from a plan that threatens to destroy it.

I see this RFP not as progress, but as a betrayal to our health, our wallets, and the home we all share. Georgia Power's proposal to expand

the state's electricity grid by 60 percent in just five years is not modernization. It's regression.

Over 95 percent of this expansion relies on fossil fuel combustion, emitting greenhouse gases that will worsen air pollution, leaving Georgia's hearts and lungs vulnerable and exacerbate the climate crisis, accelerating the rate of natural disasters we are already seeing.

Climate change is not a distant threat. It's not on the other side of the world or the country. It's already at our doorstep.

What makes this plan, the biggest fossil fuel expansion in the entire country, so hard to accept is how unnecessary it is. Renewables, like solar energy, are cleaner, more resilient and cheaper. But that would be inconvenient for Georgia Power, whose profits directly correlate with the sheer capacity they dare to build.

You all were elected to serve the public, not the companies that fund your campaigns. We know you aren't directly impacted by the steady rise of our power bills and the six rate hikes in just the last two years, but on the ground, millions of Georgians are paying the price for decisions they never agreed to.

A 15.66-plus billion-dollar expansion to our energy grid to serve data centers that don't even exist would send costs soaring, devastating families already struggling with Georgia's rising cost of living. I'm one of the millions of young adults in Georgia. And now paying my own bills, I feel the weight of these decisions every month when I receive my electricity bill.

Not only will young Georgians bear the economic burden, but your 45-year commitment to fossil fuel combustion and the impossible dream of infinite energy growth and profit will leave us with an unliveable world.

Georgia Tech projects that much of Central Georgia could experience 35 to 40 days a year with temperatures over 105 degrees by the turn of the century if fossil fuel expansion continues. Heat that will kill.

If you choose to ignore us and side with profit over people, know that every heat-related death, every flooded home, and every Georgian pushed deeper into poverty will trace back to the decisions made by the people in this room. Georgia is watching.

CHAIRMAN SHAW: Eden Zebrak, followed by

Shemika Simmer -- Simmens.

MS. ZEBRAK: Good morning, Commissioners.

CHAIRMAN SHAW: Good morning.

MS. ZEBRAK: My name is Eden Zebrak and I'm a student at Emory University. I'm here today because I care about my future in Georgia.

Atlanta is ranked as the number one city to start a career. And its thriving job market, vibrant community, life and culture make it an attractive place to live. Moving away from the city, Georgia's natural beauty offers the promise of a full and enriched life.

This state is where I want to build my life, but Georgia Power wants to destroy that dream. Georgia Power's proposed plan is dangerous and it's an assault on our future. It is a plan that scientists, economists and environmental experts -- anyone paying attention to science -- warn not to pursue.

This expansion is not about serving the people of Georgia. It's solely about serving Georgia Power's profits. Georgia Power already earns more income per customer than any comparable utility in the country. Yet, they want ratepayers to foot the 15-plus billion-dollar bill for this

expansion.

This plan will mean even higher bills and Georgia already has the fifth highest energy costs in the nation. This plan would push families even closer to the edge and push away people like me from being willing and able to live here.

Georgia Power is misleading this Commission when it says there are no other options. Other states are proving that investing in solar and renewable energy can power economies and lower costs at the same time.

Georgia is one of the top ten sunniest states in the U.S. Yet, we rank 47th in rooftop solar energy per capita. This is not a coincidence. It's because Georgia Power chooses profits over people and fossil fuels over our future.

And let's talk about what this plan really means for public health. It calls for the creation of five new methane gas plants. Methane emissions result in pollutants that can cause severe damage to human health. It fuels climate disasters, like Hurricane Helene, which grew so destructive, in no small part, due to the heat trapped by greenhouse gases, like methane.

Instead of working to mitigate this threat to

public safety, Georgia Power wants to double down. You, the Commission, are the only ones who could stop this nightmare from becoming a reality.

Over 3,000 Georgians have already spoken out against Georgia Power's continued rate hikes and fossil fuel expansions. But you continue to ignore the people you are supposed to serve. Your past policy choices have made it clear where your priorities are and it's a disappointment.

Georgia is where I want to build my life, but that dream can't happen if you continue to support plans that choose profits over people. Georgia is watching and my vote will go towards my future, not people working to ruin it.

CHAIRMAN SHAW: Shemika Simmens, followed by Daniel Beckman.

MS. SIMMENS: Hello. My name is Shemika Simmens. I am here from Chatham County, Georgia. And I am here just on behalf of the people of Chatham County.

The six rate hikes are directly impacting individuals throughout Georgia, especially throughout Chatham County. We have people with debilitating diseases, especially cancer.

The RFP -- I don't know. It seems as if you

guys don't know the decisions that you make are directly -- it will directly impact all individuals and it is directly associated with environmental justice. It seems that you guys are acting as if you don't really realize that.

It's two of you standing here, or sitting here, when it's five of you. And, I mean, you're actually disrespecting us already because people are not -- they're not here. They're not really trying to listen to us. We don't see them tuned in or anything.

When you walk outside the -- outside of these doors on Washington Avenue, you see people homeless sitting there. We don't know if the rate hikes have done it. I know that some of their testimonies can say that. Some of the rate hikes have contributed to -- contributed to homelessness.

So we have people sitting along the streets all -- you know, throughout the Capitol, throughout Atlanta, throughout Georgia. So we need to make some decisions that -- that directly help the people, not Georgia Power. The people. The people of Georgia.

Right now we're trying to help individuals, you know, with cancer that cannot afford to pay

their bills with these debilitating diseases. It's really sad. It's really disheartening what we're going through.

We brought seniors here from Chatham County. We have seniors that they just can't afford to live. They're making decisions between medicine -- medication or their bills, rent or the electric bills.

We need you guys to make decisions for us, not them. For us. And right now we -- we feel as if we don't have proper representation. I'm just being honest with you guys. This -- if this is what proper representation looks like, it's sad.

So me asking you guys, please, for our people, for our future, for our sakes, no on the RFP and make the right decisions for us, for the people, not Georgia Power. Thank you.

CHAIRMAN SHAW: Daniel Beckman, followed by Rachael Maszle.

MR. BECKMAN: Good to see you, Commissioner Echols and Commissioner Shaw. First and foremost, I want to share the sentiment of disappointment in not having a full Commission to hear this group of Georgians, some of which you just heard travel from Chatham County. I think it's absolutely critical

in this moment.

CHAIRMAN SHAW: I said, for the record, during the Administrative Session -- I don't think I did with this. Commissioner Pridemore is testifying at the FERC right now. But she's going to be -- everybody that's not listening will be watching these videos.

MR. BECKMAN: Okay.

CHAIRMAN SHAW: And just like we read all the -- there's a lot of comments that get filed for people that don't have time to come here that comment.

MR. BECKMAN: Yes, sir.

CHAIRMAN SHAW: But I appreciate that. And we are going to be taking a stop for lunch pretty soon because, you know, then we can have folks that can get back online soon. And that way we also have to stop because the cafeteria closes in certain --

MR. BECKMAN: Well, I'll make my comments --

CHAIRMAN SHAW: We're going to be here tonight.

MR. BECKMAN: Yeah. Well, I'll make -- I'll make my comment and I'll -- I'll move on from that point. But I do appreciate your service.

Look, bottom-line is, you know, a little over 24 hours ago we saw -- the world saw the Amazon web services that were completely compromised. And in seeing these -- how they suffered massive outages throughout this space, I think it's important to understand that when you have a failure that is more of a warning to a grid and to a system, especially with you-all's decisions on data centers, it shows what happened when one company holds so much power. And it shows what happens when we don't take a true consideration of our grid.

As a former regional administrator, as you know, Mr. Echols, it was my job and my responsibility to ensure these grids, the safety, but also in how we regulate our utilities and also the data centers and the impact. And here in Georgia, we face a similar reality with Georgia Power operating as a regulated monopoly and trusted by this Commission to -- to deliver safe and reliable energy. And I think everyone in here would agree.

My concern -- and I want to be very direct because over 1.8 million people in Georgia live at or below poverty. Between 2024 and 2025, we saw an

18 percent increase in homelessness. The woman that spoke earlier that talked about -- I believe she was from Milledgeville -- $750 rent, struggling to keep her lights on. Since 2017, the Trump administration has moved to rescind LIHEAP.

And as we know recently with HHS this year, the rescinding of staff critical to ensuring that that not fall in limbo is absolutely critical to where we are. And I think we have to understand the people that these six increases have affected.

I'm not going to regurgitate what we have already spoken about Plant Vogtle in such an eloquent way. We all know that it was behind schedule and tremendously above budget. And I think that's absolutely important.

But even Chris Womack himself has said that he believes that the eradication of homelessness and poverty in this state is one of his priorities. I don't see that within the Commission. I see decisions that are being made based on checks that are written from the very companies that want to eradicate that poverty.

And I think it's important that when these individuals speak, especially young people, especially the voices of what I consider Georgia's

greatest natural resource, which is our children, the next generation of young men and young women who will be in this state, and we have repeatedly heard that they're watching.

And I think it's important for you all, especially those who will watch this after this session is over, to look at this as not just an indictment against the Commission, but a moral responsibility to those who are respectively wanting a lower energy burden.

People like myself -- I grew up with asthma. I know what it's like to have an emergency inhaler. My son plays college football in Georgia. He has an emergency inhaler.

When we make decisions that impact coal ash ponds and impact areas like Juliet, Georgia, and communities around this state, it's absolutely important that we make those decisions with those individuals in mind.

I'll close here. Look, at the end of the day, one of the most important -- one of the most important conversations that we have to consider is the current government shutdown. I know this -- this Commission -- and I'll close up.

I know this Commission is not responsible for

what's happening in Washington. But when almost 118,000 individuals in this state that are federal employees may lose their jobs, when thousands of individuals stand to lose their healthcare, understand that energy assistance in this country and the lives and voices of people that are working two and three jobs that cannot be here today, they don't know who their Commissioners are, you're making decisions not based on securing the grid, but securing dignity for millions of Georgians in this state. And I hope you will consider every single comment and take into consideration of those who stood before you today and spoke.

Thank you.

CHAIRMAN SHAW: Thank you, Mr. Beckman.

COMMISSIONER ECHOLS: Let me just say a quick word. Thank you, Regional Administrator Beckman. I always appreciate your feedback.

I don't think you were here earlier in the Administrative Session when we voted to release $5 million from the Universal Service Fund to help with winter heating; 2.5 million going to a senior discount program, in addition to what we've already done; 2 million to be distributed to HopeWorks, a local nonprofit out of Grant Park that -- that

replaces hot water heaters and furnaces; and then another half a million to be distributed by the Salvation Army utility assistance program, Project Share.

So I hear you and we've taken some action earlier this morning, you know, to mitigate some of the issues that you're talking about. Thank you very much for being here, Mr. Beckman.

CHAIRMAN SHAW: We're going to stop after this, but you're -- you're Ms. -- and you've got a child. I'm not going to cut you off.

I think that would be a good point, but this would be Ms. Rachael. And if you'll come up and -- but thank you for being here.

We'll stop after that and let everybody have a quick bite to eat so we can get back. But thank you for being here.

MS. MASZLE: Thanks. Yeah, I know it's right before lunch. It's been a long morning. So thanks for listening. Sorry.

My name is Rachel Maszle and this is my daughter Inez. And I also have a younger daughter Zoe, who is at school right now.

I'm here today because a few days ago we received a letter from Georgia Power notifying us

-- sorry. This makes me nervous.

They're going to build a 500kV transmission line through our backyard. They're requiring a 150-foot easement across the property. That's the width of a football field.

We have a 2-acre property. So it's not that big. And one of the 120-foot towers is going to be built directly behind our house.

We bought our home in Fayette County in 2021. So pretty recently. It wasn't, like, a perfect house. It was built in 1980. It's an older house. But it was within our budget and we felt that it would be a wise decision to choose a home that we could afford.

We've put a lot of time and money and effort into our home. And we planted a very large garden and we have fruit trees. And we've worked on the house quite a bit with the intention of living there. You don't invest so much in a house that you're going to sell.

So we did this because we imagined that our daughters would grow up there and play in the woods in the backyard. And it's -- it's not, like, empty land. It's -- you know, it's important to our home.

But it's going to be clear-cut and it's going to be replaced with a steel tower. And when they come to test the soil in a few weeks, they're going to cut down the fruit trees that we planted so they can get back there to test it.

It's not just emotional, even though I'm obviously emotional. It is financial for us. Nobody will buy this house with a huge tower in the backyard.

We have a complete mortgage that we haven't paid off obviously. We just bought our house. Our home is not going to be worth what it was worth. I don't know if anybody will buy it if we did want to move.

And if they do offer us compensation, which they will obviously have to do that, it probably won't be enough for us to start over somewhere else with all of the effort that we've put in.

And there is potentially health risks. I know that the science is debated on these fields. But if it were your baby, would you want to take that risk of them growing up next to these lines?

This project has changed our lives overnight. This happened less than a week ago. And that's kind of all we think about now.

I'm sad that it is our story, but I'm thankful for how it has made us realize that these decisions and the local elections really matter. I can't say that I knew what your office was before this week.

So, you know, I just ask that you guys would join my family and my church in praying for a solution for us and for the other people in our community. It's going to be everybody on our street. My neighbors are in their 80s.

They have a hard time making it to the pharmacy. They can't come to a meeting like this. The neighbors on the other side, he just got a job at Walmart so he could save 10 percent on his groceries.

This path -- this is going to cut through three mobile home parks in the area. These residents don't own the land. I don't know if they'll be compensated. There's hundreds of people that live in the path of this line.

I trust that you guys are going to make a wise decision that serves this community. Thank you for listening.

CHAIRMAN SHAW: Thank you. Thank you, Ms. Rachael.

All right. And I hate to -- to cut us off, but if we don't, we'll be -- the cafeteria will close before we finish with public witnesses. So it's -- we're going to take about an hour break and we'll be back at 12:55. We'll reconvene. That's five minutes to 1:00.

So thank you-all.

(A recess was held from 11:53 a.m. until 12:55 p.m.)

CHAIRMAN SHAW: All right. There's the cue. We will -- we will pick up where we left off. Hope everyone had a chance to get a quick bite to eat.

We're back on the certification dockets and we're going to pick up where we left off. We're still going through the public comments.

And we will start with Mr. Eric Mintz. Mr. Mintz, good afternoon.

MR. MINTZ: Good afternoon, Commissioners.

CHAIRMAN SHAW: Good afternoon.

And he'll be followed Keyanna Jones Moore.

MR. MINTZ: I'm a father, a veteran, a retired physician, and a Georgia voter. I've been attending these Public Service Commission hearings for the past three years. In those three years, I've made a few comments and I've listened to comments made by hundreds of people from across the

great State of Georgia.

Just like today, the vast majority of those comments, and of the hundreds of comments that you receive by email, focus on the increasingly costly and unaffordable monthly utility bills, and on the increasingly high dependence on burning fossil fuels to make electricity. Fossil fuels that are more expensive and more harmful to Georgians health, our environment, and our climate than solar power and other renewable sources of energy.

During this three-year period, your votes and your decisions have failed to address either of these two issues in a significant or satisfactory way. Recently you voted to freeze Georgia Power's base rates at their highest levels, depriving Georgia Power customers of a long overdue rate case that could have decreased rates.

You approved Georgia Power to go forward with a 10-gigawatt IRP and supplemental resources plan predominantly dependent on burning coal in plants that should have been retired years ago, and on the expansion and construction of old and new methane gas burning, climate changing power plants. This plan will cost Georgia Power customers approximately $20 billion and will dramatically

increase the amount of greenhouse gas emissions produced by Georgia Power that contribute to even more frequent and severe storms, like Hurricane Helene.

On behalf of Georgians of all ages, I ask you to make amends and to heed the opinions of the vast majority of people who take the time to make comments at these hearings and by email. You can do that today by voting not to approve Georgia Power's request to certify and begin spending the billions of dollars for continuing to burn climate changing fossil fuels and coal burning power plants and expanding old plants and constructing new ones to burn methane gas burn power plants.

Thank you for listening, for hearing, and for acting on our comments. Georgia and the rest of the world are watching.

CHAIRMAN SHAW: Thank you.

Keyanna Jones Moore, followed by Angela Anderson.

MS. MOORE: Good afternoon. My name is Keyanna Jones Moore and I'm here on behalf of Commissioner Ted Terry, DeKalb County Super District 6. Dear Commissioners, I appeal to you as a fellow public servant charged with making

decisions in the best interest of my constituents with specific regard to the applications for Georgia Power in Dockets 56928 and 56310. I implore you to be prudent in your deliberation. I ask that you consider the environmental effects of the expanded use of methane gas and nuclear energy in deciding whether or not you'll approve these applications.

Methane gas is a potent greenhouse gas that has 80 times more warming power than carbon dioxide during its first 20 years in the atmosphere. Burning methane gas also releases deadly fine particulate matter and small-forming nitrogen oxides, as well as volatile organic compounds like formaldehyde. And these can cause cancer and respiratory problems. I serve communities that are already overly burdened with poor air quality. And the addition of these toxins into the atmosphere would only serve to exacerbate already adverse health conditions.

In addition, the DeKalb County Board of Commissioners has passed a resolution adopting a clean energy transition plan with the goal of 100 percent clean energy by 2050. But in order for us to achieve that goal, we're counting on your

partnership in prioritizing renewable energy use and acquisition.

With great authority, comes great expectation. And I understand that your position requires you to weigh many, sometimes conflicting, factors in deciding what is best for the residents of this great state. While I do not envy your position, I trust that you will keep the health and well-being of all Georgians top of mind as you deliberate over these applications.

Yours in service, Ted Terry, Commissioner of DeKalb Super District 6.

CHAIRMAN SHAW: Thank you.

Angela Anderson, followed by Wanda Moseley.

MS. ANDERSON: Grand rising.

CHAIRMAN SHAW: Good afternoon.

MS. ANDERSON: Commissioners, I'm Angela Anderson. I vote. I reside in the senior community in Chatham County. Myself, as well as my compatriots get together, sit and talk. We all entered our golden years expecting to relax, refresh, reflect. Instead, we are faced with something that we never foresaw; the increase in these electrical rates that have pushed us to the point where we are barely surviving.

And that is no joke. We're being crushed. The literal life is being squeezed out of us as we try to balance our needs and our wants.

Will we purchase food? Will we purchase our medications or will we have lights? Will we have air in the summertime or just shut it off and cook ourselves -- cook ourselves?

Okay. This is a reality, as I stated, that we never foresaw. We are the population that needs servicing as we age out and have increased ailments that require the use of medical appliances and what have you that need electricity.

I know that I have more life behind me than I have in front of me. I vote, once again, and I'm going to vote until my dying day.

I'm wondering who speaks for us when the Public Service Commission neglects our wants and needs and desires. The Public Service Commission is not the private corporation service.

Hear the people. Serve the people. Put people over profits. Listen with your ears, listen with your hearts to what has been brought before you, if you have a heart.

Vote nay on this increase. Vote nay on the increase. Vote nay on the increase.

You have to hear -- have heard something that someone said. It has to have touched you somewhere. And, if not, bootlickers. I'm sorry. I haven't heard that term from anyone, other than my generation.

You have been handed, y'all. I'm sorry. I should have said thank you before I stepped away from the podium, but I'm old.

CHAIRMAN SHAW: Dr. Melinee Calhoun, followed by Paul Glaze.

I'm sorry. Ms. Wanda Moseley. She can go after you. I got out of order there.

DR. CALHOUN: She may have left. I don't recall seeing her.

CHAIRMAN SHAW: How are you? Good afternoon.

DR. CALHOUN: Good afternoon. Good afternoon. My name is Dr. Melinee Calhoun.

CHAIRMAN SHAW: Okay. I'm sorry.

DR. CALHOUN: And I come before you not just as an advocate, but as a voice for the countless Georgians who are crying out for utilities justice. More specifically, Commissioner Shaw, though I live in Valdosta, Georgia now, I bring you greetings from the over 10,464 residents of our mutual hometown of Lakeland, Georgia, Lanier County, where

your father was the mayor for over ten years.

CHAIRMAN SHAW: You're Mr. Otis's --

DR. CALHOUN: Otis Calhoun is my father, yes, sir.

CHAIRMAN SHAW: You had a good mama, too.

DR. CALHOUN: I did. Velma Calhoun. May she rest in piece.

But I digress. In rural Georgia, especially across the Black Belt, energy and security have become a quiet crisis. Families are paying two and sometimes three times more than their income than the average Georgian is paying.

For too many, the question each month is not if they will pay their bill, but what will they have to sacrifice in order to do so; groceries, medicine, transportation, or a little comfort on a hot Georgia day or a hot Georgia night.

This is not simply an affordability issue. It is a matter of equity, health, and survival when homes and households in Randolph, Daugherty and Lanier Counties, face shutoffs and suffer from extreme temperatures because they can't afford to keep their power on. That's not just an individual hardship; that is a systemic failure.

We cannot talk about progress and prosperity

while ignoring the fact that some of our most vulnerable neighbors are living in energy poverty. When a grandmother has to choose between her heart medication and her power bill, or when a single mother has to send her child to bed sweating because she can't afford to run her air conditioning. That is not the Georgia that we should be defending.

Energy is not a privilege. It is a basic human need. One that powers our homes, our health and our hope. Yet, year after year rate increases are approved with little regard to the devastating impacts that they have on rural and low-income families.

We deserve a Commission that will stand with the people and not with the powerful. Utilities justice means making decisions that prioritize people over profits. Ensuring that every Georgian, no matter what their ZIP code is, their race, or their income can access affordable and reliable and clean energy.

It means investing in weatherization and renewable programs that reach rural homes, not just here in Metro. But I'm sorry, not sorry. Valdosta is not Atlanta. I know Lakeland is not Atlanta.

But it means, like I said, investing in those rural communities. It means transparency and accountability and compassion from those charged with protecting the public interest, as in you.

So I call for utilities justice. It's a call -- it's a cry for dignity. It's a demand for fairness. And it's a cry for people who have long waited to be seen, to be heard and valued.

Because this is a life and death consequence that you have in your hand from people that live -- already live too far from the nearest hospital and live too close to the edge of survival.

Thank you.

CHAIRMAN SHAW: Thank you, Ms. Calhoun.

Paul Glaze, followed by Diana Deetz.

MR. GLAZE: Good afternoon.

CHAIRMAN SHAW: Good afternoon.

MR. GLAZE: My name is Paul Glaze. I'm a DeKalb County resident, husband and father. I've lived all over the state; as far as Louisville, Jefferson County, and as far north as Toccoa in Stephens County.

I am here today to request that the Commission delay some of the major gas expansion in this RFP in deference to the experts on the

Commission's own staff who recommended a responsible initial expansion of 6 gigawatts during this year's RFP hearings.

The staff recommended six. The Commission wanted eight and a half. So, of course, we're here to approve ten somehow.

The reason provided is these data centers because AI is coming, because Zuckerberg wants our data, because Elon Musk wants to fire the truckers and Ubers and replace them with robots. It wasn't enough that we let these companies addict our children to social media and our phone, but now we get to be charged for the pleasure.

I went to Gainesville State College. Right now in Gainesville a data center is being proposed called Project Turbo that would cost over a billion dollars and use 150 acres of land. The developers say it will only use excess water, but the City of Gainesville has already said they do not have the capacity to service it if it reached full build-out. They don't tend to care about that. This, of course, comes precisely at the moment that Gainesville becomes a majority Hispanic community.

Local Republicans, Democrats, everyone in between, have called for the project to be canceled

because they know what it means to be in a draught, as we are right now. The Hall County Planning Commission delayed its first vote, but then met in secret in violation of Georgia law, to push the project. The residents are sure this has nothing to do with the fact the Chair of the Planning Commission works for the company selling the land to the data center.

The vote on Project Turbo will come up as soon as this Thursday. And communities like Hall County or Appling, where I learned how to drive from my father, would not be on the chopping block if this body had listened to the dedicated staffers that work for you and who did their duty to the state by testifying prudence.

What did they get in return for testifying? Commissioner Pridemore berated them in front of the industry like a child.

So I come to you today to urge you to listen to the experts on your staff tell you to not sell communities out to data centers, to the Wall Street shareholders and local opportunists to make a couple extra bucks.

Please remember that folks like me, we'll probably pay off our student loans before we finish

paying off the infrastructure you vote on here today, which is sad to say, but I hope is true. I would like to get one of them off.

Thank you.

CHAIRMAN SHAW: Thank you, sir.

Diana Deetz, followed by Elizabeth -- I can't read that.

How are you?

MS. DEETZ: Good afternoon. I'm good. How are you doing?

All righty. My name is Diana. And I live in Fayette County. And I actually live just down the road from that lovely young mother with her beautiful baby that you allowed to speak just before lunch. And we appreciate you doing that so that she could get home to her toddler.

I would like to just clarify the purpose of today's hearing. So I have some questions for you. They are just yes or no.

So the 2025 IRP was approved by you in June; is that correct?

2025 IRP was approved by you guys --

CHAIRMAN SHAW: We voted that in July. But we are not here to --

MS. DEETZ: This summer, okay.

CHAIRMAN SHAW: -- be cross-examined.

MS. DEETZ: No, no. I am not cross-examining you.

CHAIRMAN SHAW: We are here to listen to you.

MS. DEETZ: Right. So the approval gave Georgia Power permission to generate and transmit an additional 10,000 megawatts of electricity over the next decade. The IRP includes roughly 1,000 miles of new transmission lines -- here's Georgia Power's pretty picture -- and 23 strategic transmission projects.

Since that July approval, Georgia Power has requested 9,900 more megawatts of new power generation, mostly from methane gas-burning turbines and BESS units. So I'm assuming everything I'm saying is correct.

A typical gas power plant generates around 500 megawatts. So that's equivalent of about 20 new gas plants. So this hearing is to evaluate that additional requested capacity and what it means for the people of Georgia. I'm assuming then it's correct.

So I attended PSC meetings last October and again in June. Both times you guys were all invited to visit the Ashley Park substation, the

two 230kV transmission line projects and the 615-acre QTS data center that will relay solely on that new Georgia Power infrastructure, infrastructure that provides no power to the surrounding community.

These projects have transformed several Fayette County neighborhoods into 24/7 construction zones, destroying property values and residents' quality of life. Many citizens -- and this is for the Georgia Power employees who are in the overflow room that I just saw.

Many citizens in Fayette County now despise Georgia Power. I'm going to repeat that. They despise Georgia Power for turning once bucolic neighborhoods into high-voltage industrial right-of-ways.

Since Georgia Power's August 2024 Fayetteville town hall, where the company provided minimal details, the Ashley Park situation has only worsened. Dozens of homeowners have received letters about a new 35-mile 500kV transmission line. And one of those 23 strategic projects is listed right here. And that's going to impact families across Fayette, Coweta and Heard Counties.

So imagine how many more households will be

blindsided by a monopoly utility that threatens them with imminent domain and condemnation. And I repeat: Eminent domain and condemnation. That poor young woman is facing that.

If you approve Georgia Power's new 9,900-megawatt request, you'll also be approving the next wave of infrastructure that enables massive data centers to invade our neighborhoods. That would send a clear message that the profits of Georgia Power, the Southern Company, and data center developers come before the needs of the public. And I'm clearly not the first one to have stated that today.

So I'm just wondering: Is that the message you really want to send? And I hope not. Because, as already has been said, you are the Public Service Commission, not the Data Center Service Commission.

At previous meetings I shared the story of a young homeowner affected by this project. And I'm happy to report that she is here today to share her story in person.

Thank you so much.

CHAIRMAN SHAW: Thank you, Ms. Deetz.

Okay. Ms. Elizabeth -- is it Schiltzy?

MS. SCHILTZY: Schiltzy. Hi.

CHAIRMAN SHAW: Hey.

Followed by Ms. Bonnie Cannon.

MS. SCHILTZY: All right. I'll speak fast.

THE STENOGRAPHER: Well, not too fast.

MS. SCHILTZY: All right. Dear Commissioners, I was a first-time homeowner in Fayette County and my life became a nightmare when QTS data center and Georgia Power came to our town. I received notice from Georgia Power stating that they would be buying a tenth of an acre, cutting down all the trees in my front yard and installing a 200-foot pole, 230-kilovolt transmission pole several meters from my front door.

They told me if I did not accept their offer, they would seize the land through eminent domain. Throughout the year-long battle that followed, there was no transparency from Georgia Power.

I contacted every county, city, state and federal department, including the Public Service Commission, but nobody knew anything about this or were willing to help. Every public records request I submitted revealed corrupt action taken by QTS, Georgia Power, and even our PSC.

Here are just a few things that I found.

This utility infrastructure being built on our property was going directly to a private substation at QTS data centers, its infrastructure, not for public use. It is being built to support a private business.

And the proposal from QTS that was pushed through our county, Georgia Power stated that they reviewed the energy demands for the data center project and existing Georgia transmission infrastructure by the site will be sufficient for the data center project. Once approved, QTS switched providers from EMC to Georgia Power and quietly doubled the scope of their project.

As a result, Georgia Power upended the lives of hundred of Fayette citizens, including my own, forcing easements and property purchases for miles with no regard to our county land use plan and without additional review or transparency.

The siting for the transmission route was done by an internal team at Georgia Power. There was no opportunity for the community and our elected officials to weigh in on the route. QTS and Georgia Power claim this action was justified under Georgia's Territorial Electric Service Act of 1973, which allowed the customer's choice for very

large users with at least 900 kilowatts of connected load.

This law was passed to prevent utility companies from monopolizing territory. Historically, the PSC have ruled multi-tenant business models, such as apartment complexes, are ineligible for customer's choice since apartments are not using 900 kilowatts of electricity. Their collected tenants are.

Data centers are multi-tenant businesses. QTS is not using or paying for the eligible capacity. Microsoft, Oracle and any of their other tenants of this data center are estimated to use that combined load.

By continuing to allow multi-tenant data centers the power to double the scope of what was approved without requiring additional review and by allowing Georgia Power to raise citizens' rates to subsidize low fixed rates for these behemoth corporations, you're putting the people and the environment at significant risk.

Ironically, what was an anti-trust law is now being exploited under your approval and powering utilities to monopolize. It's also come to my attention that properties purchased by Georgia

Power are being wiped off the county map.

The record of my home sale have disappeared. There are no records of the taxes I paid for this property. There's not even a record of the request for the removal of all records pertaining to this property in our county system, according to the county clerk. Is Georgia Power paying taxes on these properties? We all have the right to know.

Since Georgia Power seems to be above the law, while I continue to oppose this for the sake of our community, I would like it on public record that I am not suicidal.

Thank you.

CHAIRMAN SHAW: Okay. Bonnie Cannon, followed by Cyndie Hutchings.

MS. CANNON: I'm not suicidal either.

Well, good -- I had good morning, but I guess I have to say good afternoon. My name is Bonnie Cannon.

Have you ever dreamed about what you would do if you won the lottery? I think all of us have. My dream was to have enough acreage with a small lake on it where my husband and I would build our forever home and we'd build smaller homes for our kids and their families.

About four years ago, my youngest son bought 29 acres of land with a small lake on it in Fayetteville. He called me and said excitedly: Mom, your dream has come true.

That property included a house that needed some serious TLC. And after two and a half years, my husband and I had our forever home. The depth of my happiness cannot be expressed.

That joy, however, lasted only a few months because that's when Georgia Power called. They want to bisect the property by cutting a 200-foot wide path across 3 acres to erect a 500-kilovolt transmission line. That means our house would sit on 3 acres, Georgia Power would clear-cut 3 acres, and the remaining 23 would be cut off and landlocked by private property.

If that were to happen, the property would be destroyed and the value plummet, not to mention the health risks that are associated with living within 650 feet of the EMF fade. Our house would sit around the 500-foot mark.

So why tell you this story? You've already given Georgia Power the green light to confiscate people's property, effectively destroying their homes. I bring it up because you should each

consider carefully the role that you are playing in this destruction.

If you allow Georgia Power to add 10 gigawatts of power to the grid, that will lead to the further confiscation and destruction of potentially hundreds of people's homes. Fox 5 stated in a recent report that 10 gigawatts is the equivalent amount of power usage of their entire Metro Atlanta viewing area.

According to the U.S. EIA database, that equals almost 2.8 million households. And for what? Not for the greater good of the people. It is all for data centers.

You are a regulatory body. That means that sometimes you have to tell Georgia Power no. This is one of those times. This data center craze has got to slow down.

The web is filling up with articles about this being an AI bubble that will burst. Too many data centers are being built. China is already using a chip that uses only 20 percent of the energy that U.S. chips use.

Who is going to foot the bill for the wasted infrastructure when the data centers sit at partial capacity or idle? I'll bet it will not be

Blackstone or Georgia Power. Those costs will be likely pushed on to Georgians and that would mean public subsidy for private profit.

I quote: The Georgia Public Service Commission has exclusive power to decide what are fair and reasonable rates for services under its jurisdiction. It must balance Georgia's citizens' need for reliable services and reasonable rates with the need for utilities to earn a reasonable return of investment.

Georgia Power raised rates six times since 2022. Reasonable? Last year's increase was edging towards 25 percent. Reasonable? 190,000 households were disconnected? Is that reasonable? And Georgia Power's return on investment, $2.4 billion. Reasonable? More like astronomical.

Remember, your role is to protect citizens. So please do it and vote no. And I have to say that it is very disappointing to see three empty chairs. The message it sends to me as a voter, whether intentional or unintentional, by the three people who are missing is that they don't care. They do not want to hear what we have to say because they have already made up their mind. And as a voter, so have I.

Thank you.

CHAIRMAN SHAW: Cyndie Hutchings, followed by Lisa Coronado.

MS. HUTCHINGS: Good afternoon.

Data centers and the need to power them are affecting real people. And I'm here as more proof of that.

My name is Cyndie Hutchings. As with my friends you just heard from, my story begins in Fayette County, as well. My husband and I bought our dream home in Fayetteville in 2018; 6 acres bordering horse pastures and incredible sunrise views.

We invested a lot of time and money into it as it needed some repairs and some updating. We thought it was our forever home, so we had no problem with spending the money on it.

In 2023, the massive QTS data center in Fayetteville started construction. Being 6 miles away from us, we had no concerns. We didn't know what was to come.

In 2024, we heard a rumor that neighbors across the road had been approached to sell their land for a large substation. Realizing it might be visible from the huge deck that we had just had to

rebuild on the back of our home, we realized our property value could take a big hit. Not willing to risk our investment, we sold.

As we were moving out, Georgia Power stakes appeared across the backyard. Part of our former backyard was ultimately taken to install a 500-kilovolt transmission line and huge 200-foot poles to carry it.

This is now happening to hundreds of other Fayette County residents. We moved to Troup County, thinking we were escaping data centers. We were wrong. A few months after moving there, the first one was approved.

We quickly learned of two more under study. Those would be on undeveloped land and would create the same situation that we now see destroying Fayette County, countless residential properties being impacted by the need for infrastructure on a scale that this state has never seen before.

People all over Georgia are losing their land, property value and peace of mind due to this influx of data centers. Worse yet, these hungry facilities require more power than currently exist. So power companies are making capital investments at a rate that is now eliciting whispers of a

bubble from the finance bros.

The residential ratepayers are being forced to secretly subsidize much of this and will be left holding the bag when this bubble bursts. Across the country where data centers go in, utility bills go up.

This Commission has shown that it cannot be trusted to operate in the best interests of the people of Georgia. Plant Vogtle caused rates to rise 25 percent. We now pay for the most expensive energy in the world.

You voted to raise rates six times in the last two years and now you're about to vote on a RFP to allow Georgia Power to build out an unprecedented 10 gigawatts of additional energy, 80 percent of that earmarked for data centers, most of which will rely on fossil fuels, moving us further away from renewable energy goals and causing harm to our environment and our health.

How many more Georgia families will lose their homes and financial stability in order to subsidize billionaires in their race for global AI domination? How much is enough?

If I were your PR team, I would highly advise you to wait until after the election to vote on

this Georgia Power bid. If you approve this RFP, it will not only reflect poorly on the people sitting on this Commission right here right now, it will also affect residents for decades to come. The harm you cause the people of Georgia will be your legacy. This is affecting real people, real people who vote.

Thank you.

CHAIRMAN SHAW: Lisa Coronado, followed by Elizabeth Brown.

MS. CORONADO: Good afternoon.

CHAIRMAN SHAW: Good afternoon.

MS. CORONADO: Towards the end of the 2025 IRP hearing process, Commissioner Echols told me that he had heard the public's opinions. Well, he, and all of you, have not heard the public if you characterize our comments as opinions. We have been presenting facts, studies and conclusions reached by experts' consensus in so many different fields.

For example, the global scientific community is warning that climate change had moved faster than foreseen, raising the urgency of government intervention. We are heading towards 2 degrees Celsius warming by 2050 and 3 degrees by 2100. And

the only way to avert the truly catastrophic impacts of global such warming is to rapidly transition away from the burning of fossil fuels. And cleaning up our electric grid is considered a critical first step.

Top insurance executives now warn that unless we rapidly transition away from burning fossil fuels, vasts regions of the planet can become uninsurable, threatening financial markets, global economic stability, and capitalism itself.

The military views climate change as a major cost driver, citing it as a threat to readiness infrastructure and the safety of military personnel due to its impact on military bases and its role as a threat multiplier that increases global instability.

Leading economics -- economists argue that a rapid transition to clean energy is not only economically beneficial, but also cheaper than a slow or no transition, potentially saving trillions of dollars. And the costs for technologies, like, solar and wind and battery storage, will continue to fall, leading to even lower clean energy prices.

Energy experts have shown that rooftop solar and net metering programs are a cost savings for

all customers. Dr. Marilyn Brown from Georgia Tech, when arguing for expanding that program here, stated that the reason our sunny state is 47 per capita in rooftop solar is because of insufficient Commission action and policies. And the global healthcare community has identified climate change as the greatest threat to global human health.

By categorizing what we have said as opinions, you have not heard the wisdom and the warnings of so many experts. But you have heard and listened to Georgia Power and Southern Company, companies that have a documented history of spreading climate disinformation, who are currently seeking to maximize their profits by burning a massive amount of additional fossil fuels not to provide us a reliable power, but to power data centers.

It is beyond time that you listen to the right sources. Require Georgia Power to transition rapidly to clean energy, expand the net metering program without a cap. Require Georgia Power to start a full-blown virtual power plant program. And don't approve this massive buildout of polluting, expensive planet-warming fossil fuels for data centers.

Thank you.

CHAIRMAN SHAW: Thank you.

Elizabeth Brown, followed by Carolyn K-e-o-h.

Elizabeth Brown.

(No response.)

Carolyn?

Dave Sillman. Good afternoon.

MR. SILLMAN: Good afternoon, Commissioners. Thanks for hanging in with us.

I'm Dave Sillman. I'm from Buford. I am a Georgia Power customer. I'm a big fan of clean energy. I follow those markets and trends quite a bit, but I'm here to speak as a ratepayer also bruised and battered by the six rate hikes over the last two years, north of 30 percent price inflation.

I'm heartbroken to hear the stories of all the families suffering real hardship at -- at the rate inflation, on top of all the other inflation in our economy right now. And I'm really heartbroken to know that Georgia is fourth in the country in energy burden. Thousands, if not millions, of Georgians are making hard choices to forego necessities in order to pay their power bills. And it just does not need to be that way.

Obviously here in Georgia the root cause of all this is the Plant Vogtle fiasco, a bona fide economic disaster. The Public Service Commission took a huge gamble and lost. We paid the price.

As was mentioned earlier, all of the profits were privatized. Georgia Power made millions in profits. We are cleaning up the mess. And it just does not have to be this way.

And I didn't come to rehash Plant Vogtle as much as I did ask that you do not do it again, as appears to be taking shape here with this massive request for more gas and $15 billion mostly for data centers. It's another epic historic moment really for this Commission. It's such a profound decision that you need to make not only for the size of the ask, but for the timing in which it's happening in 2025, when we are smack dab in the middle of a major inflection point in energy history and the clean energy transition.

And what I'm talking about is the dramatic uptake of renewables in power grids all over the country and all over the world. It's been a long -- at least a five-year trend. Eighty percent or more of all new power generation built on average over the last five years has been

renewables. And it's only accelerated.

Last year, 90 percent of all new power generation in the U.S. and the world was renewables. This year it's 95 percent. Solar wind and batteries. It's not altruism that's causing this. It's not environmentalism, as much as I wish it were. It's the economics.

Look no further than Texas. Texas, the reddest state in the union, is the clean energy leader or soon to be in the United States. And it is all because they opened up generation to competitive markets. Lowest cost of power wins and there you go. Texas is leading the country in renewable energy deployment. And we need to be more like Texas. That's -- that's all there is to it.

So thank you. Please don't Vogtle us again.

CHAIRMAN SHAW: Thank you. David Dunn.

Good afternoon.

MR. DUNN: Good afternoon. I'm the Reverend Dave Dunn, Pastor/Administrator of the Unitarian Universalist Metro Atlanta North congregation in Roswell.

I probably don't need to tell you or anyone here that there is a huge political divide in this

country. Some say it could threaten the democracy itself or even the country. I believe -- actually, I know the root cause of this problem.

For years now, this government, on all levels, led by elected officials, and our economy managed and regulated by elected officials, are not working for the vast majority of people in this nation. And we see the anger.

It's not working for red people, blue people, and it's most definitely not working for the young people we heard this morning. I'm the father of four young adult children in their late 20s and early 30s. They can't afford to buy a house. They can barley afford to pay the rent.

When I hear a city government or a state government or a county government, for that matter, say we are open for business, it strikes me as a non sequitur of sorts. Because corporations and businesses have executives, they have boards, they have -- if they're a publicly-traded company, they have shareholders, who can help advise them and run their business. They shouldn't need the government to do more for them.

But the people, as you have heard so many times today, they're relying on you and all elected

officials to have their back. There's nobody representing them, other than you.

So I implore you, I beseech you, for the people of this state to be not the -- to not consider them first and foremost, but for them to be your only customer. Your only customer is the people.

Thank you for taking the time to listen to all of us today.

CHAIRMAN SHAW: Thank you.

Was there anyone else that -- that we missed? I know there was a couple that may have slipped out after lunch.

Anyone else?

(No response.)

All right. Well, thank you all for -- again, for taking the time to come here and for sticking with us through the lunch break and all that. So appreciate y'all.

And we're going to move on into the hearing itself, as far as at this time we will ask the company to call up your first panel. And you may go ahead and swear them in and keep things moving.

UNKNOWN SPEAKER: I guess you guys drew the short straw. I do appreciate that you stayed.

CHAIRMAN SHAW: Thank you.

MS. PRYOR: I am waiting on one more.

CHAIRMAN SHAW: Oh, okay.

Well, I guess I could have taken a break. But I'm sure we'll probably need one at some point.

MS. PRYOR: Okay. Good afternoon, Commissioners. Allison Pryor for Georgia Power Company.

At this time I would like to call Georgia Power's panel of witness: Ms. Curylo, Mr. Grubb, Mr. Looney, and Mr. Valle.

I will note for the record that we filed the notice of publication as required by the Commission rules.

Witnesses, would you please raise your right hand.

Thereupon,

KRISTIN W. CURYLO,
JEFFERY R. GRUBB,
M. BRANDON LOONEY,

having been duly sworn, testified as follows:

MS. CURYLO: Yes.

MR. VALLE: Yes.

MR. GRUBB: Yes.

MR. LOONEY: Yes.

DIRECT EXAMINATION

BY MS. PRYOR:

Q. Mr. Grubb, please start by stating your full name, your employer, and your responsibilities for the record.

A. (Witness Grubb) Yes. Good afternoon, Commissioners. I'm Jeffery R. Grubb. I'm the director of resource planning at Georgia Power Company. And I have the privilege of leading the group that leads the company's generation planning efforts, including the development and defense of the IRPs and associated resource certifications.

Q. Ms. Curylo, would you do the same.

A. (Witness Curylo) Yes. Good afternoon, Commissioners. My name is Kristin Curylo. I'm the director of generation procurement for Southern Company. My team is the group that works across all of the retail electric operating companies to both develop and facilitate the competitive solicitations for renewable and capacity resources, such as this All-Source RFP.

Q. Thank you.

And Mr. Looney.

A. (Witness Looney) Yes. Good afternoon, Commissioners. My name is Brandon Looney and I'm the reliability planning manager for Southern Company resource planning. And my team is responsible for the evaluation

of the RFP resources.

Q. And Mr. Valle.

A. (Witness Valle) Good afternoon, Commissioners. My name is Francis Valle. I'm the director of forecasting and analytics for Southern Company. And I'm responsible for crafting the load forecast presented in this proceeding.

Q. Mr. Grubb, on July 30th, 2025, did you file or cause to be filed in Docket No. 56298, Georgia Power Company's application for the certification of the All-Source Capacity Power Purchase Agreement and company-owned proposals, including Appendices A through E in both trade secret and public disclosure format?

A. (Witness Grubb) Yes, I did.

MS. PRYOR: And, for the record, I will refer to that application moving forward as the All-Source Certification Application.

Chairman Shaw, for the record, I would like to identify the public disclosure version of the All-Source Certification Application as Exhibit GPC-1 and the trade secret version as GPC-2.

CHAIRMAN SHAW: So marked.

(The documents referred to were marked for identification as GPC Exhibits 1 and 2.)

BY MS. PRYOR:

Q. Mr. Grubb, also on July 30th, did you file or cause to be filed in Docket No. 56310, Georgia Power Company's application for the certification of the supplemental resources for 2028 to 2031 capacity, including Attachments A through D and the technical appendix in both trade secret and public disclosure formats?

A. (Witness Grubb) Yes, I did.

MS. PRYOR: And, for the record, I will refer to that application moving forward as the Supplemental Resources Certification Application.

Chairman Shaw, for the record, I'd like to identify the public disclosure version of the Supplemental Resources Certification Application as Exhibit GPC-3 and the trade secret version as GPC-4.

CHAIRMAN SHAW: So marked.

(The documents referred to were marked for identification as GPC Exhibits 3 and 4.)

BY MS. PRYOR:

Q. Mr. Grubb, on September 23rd, 2025, did you file or cause to be filed in Docket Nos. 56298 and 56310 an errata to Georgia Power's All-Source and Supplemental Resources Certification Applications, including Appendix B, Appendix C, and Appendix E in both trade

secret and public disclosure formats?

A. (Witness Grubb) Yes, I did.

MS. PRYOR: Chairman Shaw, for the record, I would like to identify the public disclosure version of the errata to Georgia Power's All-Source and Supplemental Resources Certification Applications as GPC Exhibit 5 and the trade secret version as GPC Exhibit 6.

CHAIRMAN SHAW: So marked.

(The documents referred to were marked for identification as GPC Exhibits 5 and 6.)

BY MS. PRYOR:

Q. Mr. Grubb, on August 15th, did you also prefile or cause to be prefiled 30 pages of direct testimony in question-and-answer format in this case?

A. (Witness Grubb) Yes, I did.

Q. Are there any corrections you need to make to your prefiled testimony?

A. (Witness Grubb) No, there are not.

Q. If I were to ask you the same questions today under oath, would your answers be the same as are set forth in your prefiled testimony?

A. (Witness Grubb) Yes, they would.

MS. PRYOR: Chairman Shaw, the court reporter has been provided a copy of the prefiled direct

testimony, and I now ask that it -- the direct testimony of this panel be copied into the record as if given here today.

CHAIRMAN SHAW: So marked.

(Whereupon, the prefiled direct testimony of Kristin W. Curylo, Jeffery R. Grubb and M. Brandon Looney follows:)

STATE OF GEORGIA

BEFORE THE

GEORGIA PUBLIC SERVICE COMMISSION

In Re:

Georgia Power Company's	**)**	
Application for the Certification	**)**	**Docket No. 56298**
of Capacity from the 2029-2031	**)**	
All-Source RFP	**)**	

In Re:

Georgia Power Company's	**)**	
Application for the Certification	**)**	**Docket No. 56310**
of Capacity Supplemental Resources	**)**	

DIRECT TESTIMONY OF

KRISTIN W. CURYLO, JEFFREY R. GRUBB, AND M. BRANDON LOONEY

AUGUST 15, 2025

DIRECT TESTIMONY OF
KRISTIN W. CURYLO, JEFFREY R. GRUBB, AND M. BRANDON LOONEY

IN SUPPORT OF GEORGIA POWER COMPANY'S APPLICATION
FOR THE CERTIFICATION OF THE 2029-2031 ALL-SOURCE CAPACITY RFP
POWER PURCHASE AGREEMENTS AND COMPANY-OWNED PROPOSALS
DOCKET NO. 56298

AND

GEORGIA POWER COMPANY'S APPLICATION FOR THE CERTIFICATION
OF SUPPLEMENTAL RESOURCES FOR 2028 – 2031 CAPACITY
DOCKET NO. 56310

I. INTRODUCTION

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

A. My name is Kristin W. Curylo. I am the Director of Generation Procurement at Southern Company Services ("SCS"). My business address is 241 Ralph McGill Boulevard N.E., Atlanta, Georgia 30308.

A. My name is Jeffrey R. Grubb. I am the Director of Resource Planning 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 Michael "Brandon" Looney. I am the Reliability Planning Manager for SCS. My business address is 600 North 18th Street, Birmingham, Alabama 35203.

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

A. I graduated from Georgia Institute of Technology with a Bachelor of Science in Mechanical Engineering. I also received a Master of Business Administration with a Finance Focus from Georgia State University. I began my career with Georgia Power in 2002 as an

Engineer in Transmission Line Design. I have also worked as a Transmission Analyst in Transmission Project Controls, and as a Distribution Engineer at the North Shallowford and Atlanta headquarters. I transitioned into leadership as a Distribution Support Supervisor II in Geographic Solutions and Services in 2010 and subsequently served as Engineering Supervisor for the Carrollton headquarters and for the Clayton and Cornelia areas, and then as the Transmission Maintenance Center Supervisor serving the western half of the Atlanta metropolitan area.

In 2016, I served as Assistant to the Vice President in Transmission for Georgia Power, and subsequently moved to the Line & Civil Design Manager in SCS Transmission. From 2019 to 2021, I held the role of Distribution Manager for the Jonesboro Distribution Area. In 2021, I moved to lead our statewide transmission substation and line construction crews as Construction Manager for Power Delivery Construction. I transitioned to serve as the Assistant to the Senior Vice President in Customer Strategy & Solutions in early 2022, and then to the position of Assistant to the President & CEO of Georgia Power & Southern Company where I collaborated on effective strategy, organizational advancement, and messaging for the chief executive office. In December 2023, I moved to my current role as Director of Generation Procurement for SCS where I lead our system-wide team focused on executing consistent, efficient competitive solicitations seeking capacity and renewable resources to affordably and reliably serve all customers across the Southern Company retail electric operating companies.

Q. MS. CURYLO, HAVE YOU PREVIOUSLY TESTIFIED BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION?

A. No. This is my first time testifying before the Georgia Public Service Commission ("Commission").

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

A. I began my career with Georgia Power in 1992 as a cooperative education student in Commercial and Industrial Marketing. I graduated from the Georgia Institute of Technology in 1996 with a Bachelor of Science degree in Mechanical Engineering. After joining the Company as a full-time employee in 1997, I worked in various roles within Marketing until 2001 at which time I participated in a Company developmental program where I gained experience in a wide range of functional areas. During this period, I earned a Master of Business Administration degree from Auburn University in 2000.

In 2003, I joined the Resource Policy and Planning organization at Georgia Power where I served as a Project Manager through 2006. From 2007 through 2016, I worked for SCS in various planning roles including SCS Forecasting Team Leader (2007), SCS Fuels Planning Manager (2007–2011), and SCS Resource Planning Project Manager (2011–2016) where I managed the team that supports the development of the Southern Company System ("System") Integrated Resource Plan ("IRP"). In this role, I supported Georgia Power's 2013 IRP and 2016 IRP. In 2016, I returned to Georgia Power as Project Manager in Resource Policy and Planning. Beginning in March 2018, I assumed my current position of Director of Resource Planning for Georgia Power where I led the development of the 2019 IRP, the 2022 IRP, the 2023 IRP Update, and the 2025 IRP.

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

A. Yes. I have testified in several proceedings before the Commission, including: Georgia Power's 2025 IRP, Docket No. 56002; Georgia Power's Application for Certification of the 2023 Biomass Request for Proposals ("RFP") Power Purchase Agreements, Docket No. 44880; Georgia Power's 2023 IRP Update, including the Company's Application for the Certification of Plant Yates Units 8-10 and Application for Certification of Robins, Moody, Hammond, and McGrau Ford Phase II Battery Energy Storage Systems ("BESS"),

Docket No. 55378; Georgia Power's 2022 IRP, Docket No. 44160; the Review of Georgia Power's Public Utility Regulatory Policies Act (PURPA) Avoided Cost Methodology, Docket Nos. 4822, 16573, and 19279; Georgia Power's 2019 IRP, Docket No. 42310; Georgia Power's Application for the Certification of the 2020/2021 Renewable Energy Development Initiative ("REDI") Utility Scale ("US") Power Purchase Agreements ("PPAs"), Docket No. 42625; Georgia Power's Application for the Certification of the 2018/2019 REDI US PPAs, Docket No. 41596; and Georgia Power's Application for the Certification of the 2018/2019 REDI US PPAs for the Commercial and Industrial ("C&I") Program, Docket No. 41734.

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

A. I graduated from the University of Alabama in 2003 with a Bachelor of Science degree in Mechanical Engineering. I began my career at SCS in the Engineering and Construction Services organization. During this time, I completed my Master of Business Administration from the University of Alabama at Birmingham and received my Professional Engineering License from the state of Alabama. I moved to Research and Environmental Affairs in 2007 as a Research Engineer responsible for environmental control technology with a focus on compliance with the Mercury and Air Toxics Standards ("MATS"). In 2012, I became the Environmental Controls Research Manager responsible for Southern Company's technology research portfolio for air, land, and water pollutants.

In 2013, I transitioned to Southern Company's System Planning organization, where I have held various leadership positions in several departments including Asset Management, Renewable Generation Development, and Asset and Environmental Planning. I moved into my current position in 2019, where I have primary responsibility for Reliability Planning including the Reserve Margin Study as well as the evaluation for the Company's numerous RFPs. In these roles, I have supported each Georgia Power IRP dating back to 2016, as well as several certification filings.

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

A. Yes. I recently testified before the Commission in Georgia Power's 2025 IRP proceedings in Docket No. 56002. In addition, I most recently testified in the CARES 2023 Utility Scale Renewable PPA Certification proceeding in Docket No. 56181 and the Winter 2027/2028 BESS Certification proceeding in Docket No. 56258.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. Our testimony supports Georgia Power's Application for the Certification of the All-Source Capacity Power Purchase Agreements and Company-Owned Proposals ("All-Source Application") submitted pursuant to O.C.G.A. § 46-3A-4 and Commission Rule 515-3-4-.07(5). The All-Source Application, including the executed PPAs, the Cost Expenditure and Estimated Annual Cost Table, the Engineering, Procurement, and Construction ("EPC") Agreements, the System Sale & Purchase Agreements for battery supply ("SPA"), and the Activities and Critical Path Schedules, was filed on July 30, 2025. We wish to incorporate that filing by reference into this testimony.

Our testimony also supports Georgia Power's Application for the Certification of Supplemental Resources for 2028-2031 Capacity ("Supplemental Resources Application") submitted pursuant to O.C.G.A. § 46-3A-4 and Commission Rules 515-3-4-.04(3)(f), 515-3-4-.07(2), 515-3-4-.07(5), and 515-3-4-.08. The Supplemental Resources Application, including the executed PPAs, Solar PPA Amendments, EPC Agreement, SPA, and Real Estate Purchase Option Agreement, was filed on July 30, 2025. We also wish to incorporate that filing by reference into this testimony.

Q. HOW IS THE REST OF YOUR TESTIMONY STRUCTURED?

A. Our testimony addresses the following topics in support of the Company's request to certify the winning resources selected in the All-Source Capacity RFP for 2029-2031 ("All-Source

RFP"), as well as the Supplemental Resources for capacity in 2028-2031:

- Section II discusses the conduct of the All-Source RFP;
- Section III discusses the evaluation and selection of winning resources, including PPAs and Company-Owned Proposals ("COPs");
- Section IV describes the winning All-Source PPAs;
- Section V details the remaining capacity need based on the results of the All-Source RFP;
- Section VI discusses the identification and evaluation of the Supplemental Resources proposed for certification;
- Section VII describes the Supplemental Resources; and
- Section VIII sets forth the Company's cost recovery and additional sum requests.

A more detailed description of the COPs for both the All-Source Application and Supplemental Resources Application are provided in the Direct Testimony of Michael Bush and Robert Hayes.

Q. PLEASE SUMMARIZE YOUR TESTIMONY.

A. Pursuant to the Commission's 2022 IRP Order Adopting Stipulation in Docket No. 44160 ("2022 IRP Final Order"), Georgia Power conducted the All-Source RFP seeking capacity needed in the winter 2028/2029-2030/2031 period. Accordingly, consistent with Commission RFP rules and the 2022 IRP Final Order, Georgia Power issued the All-Source RFP on June 20, 2024 seeking to procure 8,500 megawatts ("MW") of capacity resources. In this proceeding, the Company now seeks a Certificate of Public Convenience and Necessity from the Commission for 7,999 MW of resources, which includes four thermal PPAs (collectively the "All-Source PPAs"), three thermal COPs for five combined cycles ("CCs"), nine standalone BESS COPs, and two BESS + Solar COPs (collectively the "All-Source COP Proposals"). Georgia Power has procured, through a successful market-based competitive solicitation, the energy and capacity benefits from these resources, as well as

all the environmental attributes (where applicable) and electrical products produced by the facilities. Certification of these resources will contribute towards meeting Georgia Power's capacity needs through 2031 and will support the economic development and growth in Georgia.

To address capacity needs remaining after the All-Source RFP and Winter 2027/2028 BESS RFP, the Company also seeks a Certificate of Public Convenience and Necessity from the Commission for a 1,886 MW portfolio of supplemental resources that includes five BESS PPAs with NextEra Energy Resources ("NEER") entities and accompanying solar PPA amendments, a BESS COP and solar PPA amendment, a thermal PPA with Tenaska Heard County, and a PPA amendment with Mississippi Power Company ("MPC") to add additional MW for 2029 under the parties' existing contract (collectively, "Supplemental Resources"). The Company seeks certification of the Supplemental Resources through the RFP exceptions in Commission Rules 515-3-4-.04(3)(f)(3) and (6).

II. THE ALL-SOURCE RFP

Q. PLEASE PROVIDE AN OVERVIEW OF THE ALL-SOURCE RFP.

A. The All-Source RFP, authorized by the Commission's 2022 IRP Final Order, was designed consistent with the Commission's RFP Rules and solicited dispatchable capacity resources with commercial operation dates beginning in December 2028. Georgia Power also considered commencement as early as January 1, 2026, if resources were determined to be the most economic option to meet customer needs. Georgia Power sought to procure a target of 8,500 MW of capacity resources from facilities between 80 and 1,200 MW in size.

Q. PLEASE DESCRIBE THE PROCESS USED IN DESIGNING AND ISSUING THE ALL-SOURCE RFP.

A. On November 7, 2023, the Commission approved Accion Group, LLC to serve as the Independent Evaluator ("IE") in the All-Source RFP. In accordance with the Commission's

RFP rules, and with input from potential RFP participants, Commission Staff, and the IE over a period of several months, the Company drafted the All-Source RFP, a pro forma CC PPA, a pro forma Combustion Turbine ("CT") PPA, a pro forma Energy Storage System ("ESS") with Renewable Resource PPA, a pro forma Standalone ESS PPA, a pro forma Asset Purchase Agreement ("APA"), and a pro forma Build Transfer Agreement ("BTA") (collectively, the "RFP Documents").

Georgia Power then posted the draft RFP on the IE Website on February 26, 2024, and the four pro forma PPAs on March 8, 2024. The Comment Period opened on the day the RFP and pro forma PPAs were shared and closed on March 29, 2024. The Comment Period for the pro forma APA and BTA was between May 10, 2024, and May 20, 2024. Altogether, a total of 539 comments from nine participants were received and responded to via the IE Website during the Comment Periods. Each of the comments submitted was reviewed by the Company, Commission Staff, and the IE, and responses to the comments were provided to the commenters by the IE on June 11, 2024.

The Company considered and incorporated into the RFP Documents all appropriate revisions suggested by the market participants. The Company held a Bidders' Conference webinar on March 15, 2024, to allow potential bidders and interested parties the opportunity to receive more information about the RFP from Georgia Power, Commission Staff, and the IE, and to ask additional questions and provide further comment on the RFP Documents. Then, throughout the RFP process, the Company utilized the question-and-answer function on the IE Website to respond to a total 974 questions from RFP participants seeking clarification of the provisions of the RFP Documents.

Q. WHEN WERE THE FINAL RFP AND PPA DOCUMENTS CONSIDERED AND APPROVED BY THE COMMISSION?

A. On June 6, 2024, the Company filed the final RFP Documents as revised for Commission approval. The Commission approved the RFP Documents, as modified, on June 18, 2024, in its Administrative Session.

Accordingly, Georgia Power issued the All-Source RFP on June 20, 2024. The Company accepted proposals through the IE Website from qualified participants through July 18, 2024, for COP submissions and affiliate bids, and July 19, 2024, for all other bids. The Company ultimately received offers for approximately 14,902 MW of nominal capacity through 54 different proposals. After conducting a full evaluation, further described later in our testimony, the Company now seeks to certify 7,999 MW of nominal capacity resources comprising a diverse portfolio of PPAs and COPs for BESS, BESS + Solar, and thermal resources.

Q. PLEASE DISCUSS THE PROTECTIVE MEASURES EMPLOYED DURING THE ALL-SOURCE RFP TO ENSURE THE INTEGRITY OF THE EVALUATION PROCESS.

A. In accordance with the Commission's RFP Rules, Accion Group, LLC was selected as the IE for the All-Source RFP. Beginning December 14, 2023, the service date of the RFP, no bidder or potential bidder was permitted to have any direct communication with the IE, Commission Staff, or the Georgia Power Evaluation Team pertaining to the RFP or the RFP Documents, the RFP evaluation process, or any RFP-related subjects except as provided by the Commission's RFP Rules or as disclosed through the IE Website. In addition, Georgia Power and Southern Power Company filed standards of conduct regarding affiliate communications, as well as a list identifying specified members serving on the Georgia Power Evaluation Team and the Affiliate Bid Team as required by the Commission's RFP Rules. Georgia Power also voluntarily agreed to identify and separate Georgia Power and SCS team members supporting the COPs and hold itself to the same standards of conduct required between Georgia Power's Evaluation Team and its Affiliate Bid Team, as further described in the All-Source RFP. As with the Evaluation Team and Affiliate Bid Team, the COP Team filed standards of conduct and a COP Team list with the Commission and physically segregated the Evaluation Team and COP Team for the duration of the solicitation.

Importantly, the IE and Commission Staff were actively involved throughout the process providing oversight of the RFP process—from development of the RFP Documents through bid evaluation and selection of the Conforming List, Competitive Tier, and Short List. The IE Website was used for questions and comments regarding the RFP to further ensure that the process was fair, equitable, and transparent to all participants.

III. EVALUATION AND SELECTION OF WINNING RESOURCES

Q. PLEASE DESCRIBE HOW THE COMPANY SELECTED THE ALL-SOURCE PORTFOLIO, INCLUDING PPAS AND COPS, AS RESOURCES TO BRING FORWARD FOR CERTIFICATION.

A. After all proposals were submitted, Georgia Power, Commission Staff, and the IE conducted an initial screening process to assess proposals for compliance with the RFP requirements. This resulted in establishing the Conforming List—33 proposals totaling 10,160 MW of nominal capacity. Georgia Power evaluated and ranked the Conforming List using a net evaluated cost analysis approach. The net total cost is the net present value ("NPV") of the generation and transmission aspects of the submission in dollars per kilowatt ($/kW), including fixed and variable costs along with any energy benefits.

After the conclusion of both of the refreshed submission processes in late February 2025, Georgia Power re-ranked all active submissions and, on March 14, 2025, identified a Competitive Tier for further evaluation. There were 25 proposals in the Competitive Tier, totaling 9,481 unique MW of nominal capacity.

On May 16, 2025, after completing the evaluation of the Competitive Tier submissions, Georgia Power identified a Short List of winning projects to advance to contracting and certification. The Short List was comprised of 21 proposals, totaling 7,999 MW of nominal capacity.

Q. DID A COST BENEFIT ANALYSIS INFORM THE COMPANY'S EVALUATION OF THE PROPOSALS?

A. Yes. During the RFP evaluation process, the Company conducted an in-depth economic analysis, including a cost-benefit evaluation, for the projects that advanced to the Competitive Tier. This analysis included a comprehensive review of direct and indirect costs, anticipated benefits, and potential risks associated with each proposal. By leveraging industry standard and proprietary economic modeling techniques, the Company forecasted the long-term value and viability of the capacity resources. The evaluation process was consistently applied to both market bids and COPs. Collectively, the portfolio of PPAs and COPs are economical resources that provide both capacity benefits and resource diversity to Georgia Power customers. Certification of these new capacity resources is appropriate under Georgia law and the Commission Rules, and is in the best interest of all customers.

Q. HOW DID THE COMPANY DETERMINE WHICH RFP PROPOSALS PROVIDED THE BEST VALUE FOR CUSTOMERS?

A. As described above and consistent with the All-Source RFP and Commission Rules, the Company conducted a comprehensive evaluation of each RFP submission to determine which resources meet the Company's capacity need at the lowest evaluated cost. This evaluation not only considers the costs and benefits, but also accounts for the different contract terms and resource lives. Consistent with prior RFP evaluations, the Company used a term equalization component to evaluate resources with different useful lives, start dates, or end dates on a comparable basis.

Throughout the evaluation process, the Commission Staff and the IE independently verified the Company's evaluation methodology, determinations, and steps taken to select the Competitive Tier and Short List.

Q. DOES THE RESULTING PORTFOLIO OF RESOURCES INCLUDE THE TYPES OF TECHNOLOGIES TO BEST MEET CUSTOMERS' NEEDS?

A. Yes, a diverse combination of CCs, CTs, BESS, and BESS + Solar is representative of recent expansion plans in the Company's IRP Resource Mix Studies, specifically included in the recently concluded 2025 IRP, the 2023 IRP Update, and the 2022 IRP. As discussed in those proceedings, the resource mix study provides guidance on which resource types are expected to provide value to customers in light of various uncertainties addressed in the Company's scenario planning process. Through the RFP process, each resource type is appropriately evaluated as noted above to determine its value to customers. CCs play an important role due to their ability to not only meet capacity needs but also provide the high levels of 24x7 energy that are needed to serve the Company's increasing loads from large load customers. Additionally, CCs are critical to the resource mix because they enhance energy adequacy assurance through committed natural gas supply and firm pipeline transportation. BESS, while not producing energy and having limited duration, provide flexibility in their operational and dispatchable characteristics, which can provide response to dynamic loads and provide capacity during peak periods. Finally, the BESS + Solar resources combine flexible capacity resources with a source of energy for energy needs and for charging, which pairs well for minimizing transmission infrastructure investments.

Q. PLEASE ELABORATE ON THE REFRESHED SUBMISSION PROCESS.

A. To account for the extended period of time between the proposal due date and anticipated certification and potential policy and market shifts that could take place during that period, the All-Source RFP included a submission refresh process, which permitted a one-time, price-only submission refresh to allow RFP participants the opportunity to modify the fixed-price portion of their proposal prices by either decreasing or increasing their original price as a final and best offer (the "Refreshed Submission Process"). On December 19, 2024, in advance of the Refreshed Submission Process, Georgia Power provided each active RFP participant on the Conforming List with a ranked position for each of their

submissions. The price-only Refreshed Submission Process occurred as scheduled and opened on January 14, 2025, and closed on January 28, 2025.

As the Company continued to monitor its capacity needs and foresaw the lack of resources in the 2027 – 2029 timeframe, the Company requested Commission approval in January 2025 to modify the Refreshed Submission Process to additionally seek information on whether RFP participants could offer alternative Commercial Operation Dates ("CODs") or Delivery Commencement Dates ("DCD"), as applicable. On January 28, 2025, Georgia Power formally filed a revised request seeking a separate COD/DCD submission refresh process, and on February 4, 2025, the Commission approved the voluntary COD/DCD submission refresh process. All revised submissions were submitted by February 25, 2025. Only six of the COP BESS and BESS + Solar proposals offered alternative dates for further evaluation.

Q. DID THE COMPANY PERFORM A TRANSMISSION ANALYSIS OF THE PROJECTS?

A. Yes. The Company completed a portfolio transmission evaluation of the potential project portfolios prior to the selection of Short List proposals. As part of this process, the Company: (1) identified interconnection projects and costs for each Competitive Tier proposal; (2) performed contingency analyses to determine any transmission constraints; and (3) developed project solutions to address identified limitations in each portfolio. The Company developed cost estimates for these delivery-related transmission projects and, if applicable, advancement costs for existing transmission projects were incorporated to reflect adjusted project completion timelines.

Q. IS FURTHER EVALUATION NEEDED RELATED TO THE PROJECT SOLUTIONS IDENTIFIED FOR DELIVERY SERVICE FOR ANY OF THE ALL-SOURCE RESOURCES?

A. As a result of the transmission projects identified for the new-build proposals in the All-Source RFP, coupled with the transmission projects identified in the Company's current Ten Year transmission plan, the Company is now performing its annual, comprehensive review of identified delivery projects to confirm construction feasibility and outage coordination required to support project CODs. The Company anticipates completing this review and confirmation in September 2025.

Q. HOW DID THE RENEWABLE COST BENEFIT FRAMEWORK FACTOR INTO THE BID EVALUATION PROCESS?

A. The Company's evaluation of BESS + Solar projects continued implementation of the Renewable Cost Benefit Framework ("RCB Framework"), which offers a structured and systematic approach to assessing the potential impact of each project. The RCB Framework is used to evaluate projects with intermittent delivery based on several critical criteria, including their capacity contribution to grid reliability, economic benefits, environmental impact, and costs. This evaluation process ensures that chosen projects address the capacity needs and facilitates the integration of additional renewable generation.

IV. DESCRIPTION OF WINNING PPAS

Q. PLEASE DESCRIBE THE RESOURCES GEORGIA POWER SEEKS TO CERTIFY.

A. Through the All-Source RFP, Georgia Power selected a winning portfolio totaling 7,999 MW and comprised of four PPAs and 14 COP projects that provide the greatest value for all customers. The results of the All-Source RFP expand the Company's generation portfolio and add resources that provide energy and capacity benefits along with environmental attributes and electrical products to Georgia Power customers. Description

of the All-Source PPAs are included in the All-Source Application and detailed further below, whereas the COP projects are described in the Direct Testimony of Company Witnesses Michael Bush and Robert Hayes.

Q. DID THE COMPANY SUBMIT COPIES OF THE PPAS TO THE COMMISSION?

A. Yes. Trade Secret and Public Disclosure versions of the All-Source PPAs are attached to Georgia Power's Application as Appendix A and were filed with the Commission on July 30, 2025.

Q. PLEASE ELABORATE ON THE ALL-SOURCE PPAS THAT THE COMPANY HAS PROPOSED FOR CERTIFICATION.

A. Following the comprehensive evaluation process detailed above, Georgia Power entered into four PPAs totaling 1,195 MW that are proposed for certification. The four PPAs, as shown on Table 1.2 of the Application, are as follows:

(1) The Sandersville PPA is a 15-year PPA with AL Sandersville, LLC that will provide firm capacity, firm energy, and ancillary services from the 146 MW Sandersville facility located in Warthen, Washington County, Georgia. The Sandersville facility provides a winter equivalent capacity of 156 MW. Delivery under the Sandersville PPA will commence on November 30, 2030.

(2) A 20-year PPA with Mid-Georgia Cogen L.P. that will provide firm capacity, firm energy, and ancillary services from the 317 MW Mid-Georgia Cogen facility located in Kathleen, Houston County, Georgia ("Mid-Georgia Cogen PPA"). The Mid-Georgia Cogen facility provides a winter equivalent capacity of 320 MW. Delivery under the Mid-Georgia Cogen PPA will commence on June 1, 2028.

(3) A 10-year PPA with Southern Power Company that will provide firm capacity, firm energy, and ancillary services from the 74 MW Plant Dahlberg facility located in Nicholson, Jackson County, Georgia ("Dahlberg 4 PPA"). The Plant Dahlberg facility

provides a winter equivalent capacity of 87 MW. Delivery under the Dahlberg 4 PPA will commence on June 1, 2030.

(4) A 15-year PPA with Southern Power Company that will provide firm capacity, firm energy, and ancillary services from the 658 MW Plant Harris facility located in Prattville, Autauga County, Alabama ("Harris 1 PPA"). The Plant Harris facility provides a winter equivalent capacity of 683 MW. Delivery under the Harris 1 PPA will commence on June 1, 2030.

These All-Source PPAs allow Georgia Power to continue to achieve a balanced supply portfolio, while meeting customer demand for the specified timeframe and maintaining system reliability and affordability for all customers.

Q. HOW DO THE TERM LENGTHS OF THE PPAS PROPOSED FOR CERTIFICATION BENEFIT CUSTOMERS?

A. Georgia Power opted for longer-term PPAs with the four Winning Bidders to enhance price certainty and establish a stable bridge to future long-term supply options. The extended contract durations will mitigate capacity price volatility and ensure a reliable supply of capacity resources to meet customers' energy needs.

V. OUTSTANDING CAPACITY NEED

Q. DO THE RESOURCES IN THE ALL-SOURCE CERTIFICATION FULLY ADDRESS THE COMPANY'S CAPACITY NEEDS FOR 2029-2031?

A. No. Georgia Power sought up to 8,500 MW of capacity resources in the All-Source RFP. After comprehensively evaluating the All-Source RFP submissions, the Company selected a total portfolio of 7,999 MW of resources comprising a diverse mix of BESS, BESS + Solar, and thermal resources. Certifying each of these resources supports Georgia Power's February 2025 Load Forecast, which was included in the Company's 2025 IRP Rebuttal Testimony in Docket Nos. 56002 and 56003. The Company's projections will be reviewed

further with the Budget 2026 Load Forecast, which is scheduled for submission in this Docket by September 17, 2025. However, the Company was unable to identify resources sufficient to meet *all* projected capacity needs through 2031. Paired with the outstanding capacity need following the Winter 2027/2028 BESS RFP, the Company has a capacity need remaining for the Winters of 2027/2028 through 2030/2031.

Q. HOW WILL THE COMPANY ADDRESS THESE REMAINING CAPACITY NEEDS?

A. When the Company determined that it would not be able to procure resources to meet its Winter 2027/2028-2030/2031 capacity needs through existing capacity RFPs, the Company sought to identify supplemental resources to meet its remaining capacity needs. Similar to the approach taken in the 2023 IRP Update, the Company sought first to leverage additional System length, uncovered existing resources in the market, and siting BESS resources at existing solar facilities with the goal of minimizing transmission interconnection and upgrade costs. The Company included the identified resources in the Company's Application for the Certification of Supplemental Resources for 2028-2031 Capacity, filed on July 30, 2025, in Docket No. 56310.

VI. IDENTIFICATION AND EVALUATION OF SUPPLEMENTAL RESOURCES

Q. PLEASE DESCRIBE THE SUPPLEMENTAL RESOURCES THAT GEORGIA POWER SEEKS TO CERTIFY.

A. The Company has proposed for certification in Docket No. 56310 a strategic mix of PPAs, PPA amendments, and a Company-owned proposal, specifically consisting of:

- Five BESS PPAs with NextEra Energy Resources ("NEER") (the "NEER BESS PPAs") providing a total, nominal capacity of approximately 646 MW of four-hour BESS paired with existing solar facilities with current Georgia Power PPAs.

- The 260 MW four-hour Wadley BESS Project paired with an existing solar facility with a current Georgia Power PPA. This Company-owned proposal is discussed in further detail in the Direct Testimony of Company Witnesses Michael Bush and Robert Hayes.
- A PPA with Tenaska Georgia Partners, L.P. (the "Tenaska Heard County PPA") for six dual-fuel CTs at the Heard County facility for 930 MW summer capacity and 945 MW winter capacity.
- An amendment to the Company's current PPA with MPC for 50 MW of nominal capacity and associated energy to add an additional year (January 1, 2029, through December 31, 2029) to the Company's current PPA ending on December 31, 2028.

These supplemental resources leverage existing infrastructure and relationships to maximize benefits to customers and provide necessary energy and capacity to meet the Company's capacity needs in winter 2027/2028 through winter 2030/2031.

Q. DID THE COMPANY SUBMIT A COPY OF THE PPAS AND MAJOR CONTRACTS SUPPORTING THE SUPPLEMENTAL RESOURCES TO THE COMMISSION?

A. Yes. Trade Secret and Public Disclosure versions of the PPAs, PPA amendments, and other major contracts were filed with the Commission in the Technical Appendix to Georgia Power's Supplemental Resources Application on July 30, 2025.

Q. WHY IS THE COMPANY ADVANCING THESE SUPPLEMENTAL RESOURCES FOR CERTIFICATION?

A. The Company is requesting that the Commission certify the proposed Supplemental Resources to meet projected capacity needs that remain following the Winter 2027/2028 BESS RFP and All-Source RFP. The proposed resources will allow for the timely deployment of necessary supply-side resources and mitigate risks where the Winter 2027/2028 BESS RFP and All-Source RFP did not yield sufficient capacity or will not

offer enough firm and dispatchable resources to reliably serve customers. Due to the timing of the identified capacity needs, which were determined after the results of the Winter 2027/2028 BESS RFP and 2029-2031 All-Source RFP, it is not possible to conduct another RFP that would allow the Company to develop, procure, or purchase energy and capacity to meet this near-term capacity need. Certifying these Supplemental Resources will allow Georgia Power to continue providing reliable and cost-effective service to support opportunities for continued customer growth.

As described more fully below, the proposed Supplemental Resources leverage the RFP exemptions in the Commission's Rules to acquire available capacity on the Southern Company system in this constrained capacity and energy market, utilize existing transmission interconnections for newly proposed BESS resources, and construct new supply-side assets to ensure capacity is available by the capacity need dates.

Q. HOW DO THE SUPPLEMENTAL RESOURCES BEST ADDRESS THE COMPANY'S OUTSTANDING CAPACITY NEEDS?

A. The proposed Supplemental Resource portfolio allows Georgia Power to efficiently and cost-effectively meet customer demand and reliability needs for the earliest capacity need in winter 2027/2028 and continuing through winter 2030/2031. The Company developed a portfolio that uses existing relationships, infrastructure, and connectivity to satisfy customer demand within the near-term capacity need timeframe. The Supplemental Resources provide a combination of added system length, existing resources, and optionality to pair new BESS resources with existing solar facilities. This approach maximizes value by leveraging access to available capacity through resources with established interconnections and minimal transmission upgrades. For example, Georgia Power strategically selected the proposed NEER BESS PPAs and the Wadley BESS project to leverage existing transmission infrastructure, which saves time and avoids capital investments otherwise required to construct transmission interconnection facilities and transmission system upgrades for new resources. In addition, like the All-Source portfolio

of resources, the proposed portfolio of Supplemental Resources furthers resource diversity and provides a balance of technologies to ensure a reliable and efficient generation fleet.

Q. HOW DID THE COMPANY DETERMINE THAT THE SUPPLEMENTAL RESOURCES WERE A GOOD VALUE FOR CUSTOMERS?

A. The Company performed a comprehensive evaluation, included as Attachment A to the Supplemental Resources Application, that contains a cost-benefit analysis of all the Supplemental Resource options. This economic analysis reflects the costs and schedules from the PPAs, as well as the EPC Agreement and SPA for the Wadley BESS project, and uses the same methodology and assumptions as the 2029-2031 All-Source RFP evaluation. As such, the Company was able to compare the prices resulting from the Supplemental Resources to those received in the All-Source RFP. This demonstrates that the Supplemental Resources represent a value that is comparable to resources that were selected in a market-based RFP and that customers are best served by a waiver of the Commission's RFP Rule in support of certifying these resources.

Q. WHY IS THE COMPANY REQUESTING A WAIVER OF THE COMMISSION'S RFP RULE INSTEAD OF PROCURING RESOURCES AS PART OF THE ALL-SOURCE OR WINTER BESS RFP?

A. The Company did not identify the outstanding capacity need until the advanced stages of Winter BESS and All-Source RFPs, including the COD Refresh process. Given the duration of the RFP process and the time required to develop, procure, or purchase energy, the Company cannot rely on the RFP process to meet its remaining near-term capacity needs. Therefore, Georgia Power requests Commission approval for the Supplemental Resources under RFP process exceptions outlined in Commission Rule 515-3-4-.04(3)(f). Two specific exceptions apply to the resources identified in the Supplemental Resources Application. First, Commission Rule 515-3-4-.04(3)(f)(3) provides an exception for supply-side capacity resources of extraordinary advantage that require immediate action. Second, Commission Rule 515-3-4-.04(3)(f)(6) gives the Commission authority to exclude

any new supply-side resources from the RFP process. Allowing Georgia Power to procure critically needed resources in accordance with these RFP exceptions will allow Georgia Power to continue providing its customers with timely and reliable electric service and support Georgia's economic growth. By leveraging various procurement options, the Company is able to maintain a diverse resource portfolio that includes market resources, Company-owned resources, and a balance of resource technologies to ensure a reliable and efficient generation fleet.

VII. DESCRIPTION OF SUPPLEMENTAL RESOURCES

A. NEER BESS PPAs

Q. PLEASE DESCRIBE THE NEER BESS PPAS.

A. The NEER BESS PPAs are each four-hour BESS that will be paired with an existing NEER solar facility for which the Company has a pre-existing NEER solar PPA, allowing the BESS to be charged from that adjacent existing solar facility. The NEER BESS PPAs have 25-year terms and expected in-service dates of November 30, 2027. The site specifics and nominal capacities for each of the NEER BESS PPAs are as follows:

- Decatur BESS PPA (200 MW)
- Dougherty County BESS PPA (120 MW)
- Washington County BESS PPA (150 MW)
- White Oak BESS PPA (76 MW)
- White Pine BESS PPA (100 MW)

To facilitate quick deployment, the NEER BESS PPAs will utilize existing solar interconnections and will be charged primarily by the existing solar facility at each site. The BESS equipment will be constructed with the capability to grid-charge should operating conditions allow it or the Company seek to pursue that option at a later date.

Q. PLEASE DESCRIBE THE NEER SOLAR PPA AMENDMENTS.

A. Georgia Power has proposed to amend its existing NEER solar PPAs to allow for the paired operation of the NEER BESS and Wadley BESS projects with the existing solar facilities. The amendments would: (i) allow the seller to deliver, and Georgia Power to receive and pay for, solar energy at a metering point before the point of interconnection; (ii) ensure Georgia Power can dispatch solar energy on automatic generation control ("AGC") and in parallel with the BESS; and (iii) address the interconnection of the BESS to the existing solar point of interconnection, including any outage to the existing facility caused by BESS commissioning, testing, and interconnection.

The White Oak, White Pine, and Dougherty County solar PPA amendments extend the solar PPA term to align the term length with the associated BESS PPA. The Dougherty County solar PPA amendment also allows the NEER counterparty to "repower" the existing solar facility by upgrading and replacing equipment in a manner that will incrementally increase the solar facility's generating output. The incremental energy made available through the repower project will, subject to Commission approval, be paid for by Georgia Power at the original contract energy prices, escalated per the originally contracted escalation rate.

Q. WHY DID THE COMPANY SELECT THE NEER BESS PPAS AS RESOURCES FOR CERTIFICATION?

A. Due to a large and early capacity need, the Company sought a counterparty with a large portfolio of sizeable solar facilities that would provide the Company an opportunity to deploy hundreds of MW of BESS by the end of 2027. The Company approached several potential partners to secure various capacity options to meet Georgia Power's capacity needs. However, few entities could meet the specified criteria. Engagement with NEER was identified as a good opportunity for adding Supplemental Resources since it is the largest counterparty in the Company's current renewable portfolio.

The NEER BESS PPAs will utilize existing interconnection rights and transmission deliverability to provide Georgia Power energy and capacity by November 30, 2027. By leveraging resources already under contract by the Company, Georgia Power can minimize the time to service and risk of delay due to interconnection. As proposed, the NEER BESS PPA resources, along with the Wadley BESS project, will be charged by the existing NEER solar facilities, as addressed in the solar PPA amendments, but may have opportunities to be charged by the grid in the future. As such, these projects save time and avoid additional capital investment that would otherwise be required to construct interconnection facilities and transmission system upgrades to charge and discharge the BESS. The NEER BESS PPAs will also provide energy arbitrage benefits and optimize energy savings by shifting energy from hours with a relatively low system marginal cost to hours with a relatively high system marginal cost. Each of the BESS resources will also firm up the winter planning capacity of the existing solar facilities by storing energy that can then be dispatched by system operators to benefit the grid.

B. Wadley BESS Project

Q. PLEASE DESCRIBE THE WADLEY BESS PROJECT

A. The Wadley BESS Project is a 260 MW BESS facility slated to be paired with an existing NEER solar facility under contract with the Company. The Direct Testimony of Michael Bush and Robert Hayes describes the Wadley BESS Project in more detail.

Q. WHY DID THE COMPANY IDENTIFY THE WADLEY BESS PROJECT AS AN EXTRAORDINARY ADVANTAGE?

A. As part of the discussions with NEER regarding the portfolio of solar projects that could support paired BESS, in addition to the NEER PPAs, NEER offered Georgia Power the opportunity to develop its own BESS at one of NEER's solar facilities. Given the capacity need, the minimal transmission investment needed to obtain an additional 260 MW, and the speed at which the resource could be deployed, Georgia Power identified this

opportunity as an additional extraordinary advantage for meeting winter 2027/2028 capacity needs.

C. Tenaska Heard PPA

Q. PLEASE DESCRIBE THE TENASKA HEARD PPA.

A. The Tenaska Heard PPA will deliver Georgia Power 930 MW summer capacity and 945 MW winter capacity from six existing CTs beginning June 1, 2030, upon the expiration of the Company's existing PPA.[1]

Q. HOW DID THE COMPANY IDENTIFY THE TENASKA HEARD PPA AS AN EXTRAORDINARY ADVANTAGE?

A. Tenaska offered a PPA for the Tenaska Heard County CTs in the All-Source RFP, but Tenaska's bid did not advance to the Conforming List and was released because of the material changes to the pro forma PPA requested by Tenaska. After the Tenaska bids were released from the All-Source RFP, the Company realized additional capacity was needed and inquired if Tenaska was still available to contract in the needed term. Because few existing market resources are available to help meet needs by winter 2030/2031, the Tenaska PPA provides a great deal of value by serving existing customers within the Georgia footprint. The parties engaged to seek an agreement to re-contract for this capacity. Ultimately, Tenaska honored the PPA pricing offered in its All-Source RFP bid in exchange for the Company agreeing to certain modifications to the PPA. Given the exceptional scale and distinctive characteristics of the Tenaska facility, the Company determined these modifications were commercially reasonable and appropriate in this instance.

[1] The CTs are operationally capable of up to 1,080 MW winter capacity on fuel oil. The Company is evaluating transmission availability above the currently designated winter capacity of 945 MW; therefore, the 945 MW winter capacity rating is reflected in the evaluations of this resource until the Company can confirm the full 1,080 MW.

Georgia Power currently has an existing PPA with Exelon for the Tenaska Heard County CTs through May 31, 2030, as Exelon Heard Units 1-6. The proposed Tenaska Heard County PPA secures this existing market resource for 20 additional years starting June 1, 2030. This PPA guarantees continued delivery of energy and capacity without the need for additional transmission infrastructure or system upgrades and in advance of the winter 2031 capacity need.

D. MPC PPA Amendment

Q. PLEASE DESCRIBE THE MPC PPA AMENDMENT.

A. The proposed MPC PPA amendment would provide Georgia Power access to 50 MW for calendar year 2029 under the Company's existing MPC PPA, which was approved in the 2023 IRP Update.

Q. HOW DID THE COMPANY IDENTIFY THE MPC PPA AS AN EXTRAORDINARY ADVANTAGE?

A. Similar to the approach used in the 2023 IRP Update, the Company looked to existing system length and the option to extend the previously approved MPC PPA to secure additional energy and capacity. The MPC PPA amendment will allow the Company to utilize an additional 50 MW of existing resources in the Southern Pool for the benefit of Georgia Power customers and avoids the need for system upgrades.

VIII. COST RECOVERY AND ADDITIONAL SUM FOR ALL-SOURCE RFP AND SUPPLEMENTAL RESOURCES

Q. WHAT ARE THE PPA COSTS THAT THE COMPANY SEEKS TO CERTIFY?

A. For the All-Source Application, Table 4.4 provides the annual capacity pricing for the All-Source PPAs. The pricing begins on the delivery commencement date and extends through the remaining term of the PPA. Pursuant to O.C.G.A. § 46-3A-8, Georgia Power is entitled

to recover in rates the approved or actual cost, whichever is less, of any certificated long-term power purchase.

For the Supplemental Resource PPAs, the Company is requesting certification of the long-term purchased power costs of the NEER BESS PPAs, the Tenaska Heard County PPA, and the MPC PPA amendment as set forth in the PPAs and PPA amendments included in the Technical Appendix to the Supplemental Resources Application.

Q. HOW WILL THE COMPANY RECOVER THE COSTS TO IMPLEMENT AND ADMINISTER THE ALL-SOURCE AND SUPPLEMENTAL PPAS?

A. Georgia Power proposes to recover in its retail cost of service the costs associated with the Winning Bidders' PPAs, as applicable, consistent with other PPAs certified by the Commission.

For the Supplemental Resource PPAs, Georgia Power proposes to recover the costs associated with the NEER BESS PPAs, the NEER Dougherty County Solar PPA amendment, the Tenaska Heard County PPA, and the MPC PPA amendment in its retail cost of service, consistent with other PPAs certified by this Commission and with the requirements of O.C.G.A. § 46-3A-8. The Company will continue recovering the cost of the existing solar PPAs through the fuel clause.

Q. WHAT COST IS THE COMPANY ASKING THE COMMISSION TO CERTIFY FOR THE COMPANY-OWNED BESS, BESS + SOLAR, AND THERMAL PROJECTS?

A. Georgia Power is seeking to certify the development costs for the portfolio of the twelve COP BESS, and BESS + Solar projects of **REDACTED**, and the portfolio of the three Thermal projects of approximately **REDACTED**, respectively, which includes the engineering, construction, oversight, and associated procurement costs, financing costs, and ad valorem taxes. The individual COP project cost expenditure details can be found in

Appendix A to the All-Source Application and in the Supplemental Resources Application for the Wadley BESS project.

Q. HOW DOES GEORGIA POWER PROPOSE TO RECOVER THE COST OF THE COMPANY-OWNED BESS, BESS + SOLAR, AND THERMAL PROJECTS?

A. Georgia Power proposes to recover the costs associated with the construction of the COP BESS, BESS + Solar, and Thermal projects through base rates and will reflect the operating expenses associated with the units in its retail cost of service. Regulatory treatment for these units will be consistent with the current treatment of Georgia Power's existing owned retail generation facilities. For the COP BESS projects, Georgia Power will be opting out of the ITC tax normalization, as necessary, to provide those benefits most favorably to customers.

Q. WHAT ADDITIONAL SUM IS THE COMPANY PROPOSING FOR THE ALL-SOURCE AND SUPPLEMENTAL RESOURCE PPAS?

A. O.C.G.A. § 46-3A-8 provides for the Company to receive an additional sum for long-term power purchases. When calculating the additional sum, the statute requires that lost revenues, changed risks, and an equitable sharing of benefits between the utility and its retail customers be considered. Consistent with the additional sum approved for the Company's procurement of long-term capacity PPAs certified as part of Georgia Power's 2022 and 2025 IRPs for new DER and Demand Response programs, the Company requests an additional sum of $3/kW-year for the four PPAs to be certified.

The Company is also requesting an additional sum of $3/kW-year for the NEER BESS PPAs, the Tenaska Heard County PPA, and the MPC PPA amendment, consistent with the additional sum approved by the Commission for capacity purchases in the 2022 and 2025 IRPs.

Q. WHAT COSTS WOULD THE COMPANY SEEK TO RECOVER SHOULD THE COMMISSION DECLINE TO CERTIFY THE ALL-SOURCE AND SUPPLEMENTAL RESOURCES IN THIS APPLICATION?

A. Consistent with the Commission's May 19, 2025, Order Granting Joint Petition of Georgia Power Company and the Public Interest Advocacy Staff and Approval of the Stipulation to Extend the Alternative Rate Plan, if Commission does not certify one or more of the resources sought for certification in the All-Source or Supplemental Resources certification proceedings, the Company would seek recovery of any pre-construction costs incurred that are not useful or transferable to other potential projects. For example, such costs would include reservation fees for long lead time equipment and scoping and engineering study costs associated with the projects intended to serve retail customers' needs. To the extent not recovered through other means, the Company would propose to defer such project costs, including associated financing costs, to a regulatory asset for recovery in a future base rate case.

IX. CONCLUSION

Q. PLEASE SUMMARIZE THE SPECIFIC REQUEST THE COMPANY IS MAKING IN THIS CASE.

A. Approval of Georgia Power's All-Source Application and Supplemental Resources Application will ensure the continued provision of clean, safe, reliable, and affordable electric service to its customers, support the continued economic growth of the state of Georgia, and support the continued diversification of energy resources in its portfolio. Therefore, the Company is requesting that the Commission:

(1) Grant a Certificate of Public Convenience and Necessity for each of the four All-Source PPAs;

(2) Grant a Certificate of Public Convenience and Necessity for the All-Source COP BESS and BESS + Solar portfolio, consisting of:

a. South Hall BESS

b. Bowen Phase I BESS

c. Bowen Phase II BESS

d. Wansley BESS

e. Thomson BESS

f. Hammond Phase II BESS

g. Yates 320 MW BESS

h. Yates 250 MW BESS

i. McIntosh BESS

j. Laurens County BESS + Solar

k. Plant Mitchell BESS + Solar

(3) Grant a Certificate of Public Convenience and Necessity for the All-Source COP Thermal portfolio, consisting of:

a. Bowen Units 7-8

b. Wansley Units 10-11

c. McIntosh Unit 12

(4) Grant a Certificate of Public Convenience and Necessity for the NEER BESS PPAs and amend the certificate for the associated solar PPA amendments through the RFP exceptions in Commission Rule 515-3-4-.04(3)(f)(6) and (7);

(5) Grant a Certificate of Public Convenience and Necessity for the Wadley BESS project and amend the certificate for the associated solar PPA amendment through the RFP exceptions in Commission Rule 515-3-4-.04(3)(f)(6) and (7);

(6) Grant a Certificate of Public Convenience and Necessity for the Tenaska Heard County PPA through the RFP exceptions in Commission Rule 515-3-4-.04(3)(f)(6) and (7);

(7) Amend the certificate for the MPC PPA to extend the contract through 2029 for 50 MW of capacity through the RFP exceptions in Commission Rule 515-3-4-.04(3)(f)(6) and (7);

(8) Approve the total deemed certified amount of the COP BESS portfolio, COP BESS + Solar portfolio, and COP Thermal portfolio in the All-Source Application and Supplemental Resources Application; and

(9) Approve the recovery of the Company's Additional Sum as requested in the All-Source Application and Supplemental Resource Application.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes.

BY MS. PRYOR:

Q. Mr. Valle, on September 17th, 2025, did you prefile or cause to be prefiled Georgia Power's budget 2026 load and energy forecast, as well as 20 pages of direct testimony in question-and-answer format in this case?

A. (Witness Valle) Yes, I did.

Q. Are there any corrections you need to make to either the load forecast or your prefiled testimony?

A. (Witness Valle) I believe the testimony has a misstated figure that is -- that needs to be corrected.

Q. Okay. And are -- do you know which figure that is?

A. (Witness Valle) Oh, it's page 2. Give me a second, please.

Page 3, lines -- line 22. It states winter -- Georgia Power's winter peak demand for 2030/3031. It should be 2030/2031.

Q. Thank you.

Other than the -- other than that change, if I were to ask you the same questions today under oath, would your answers be the same as are set forth in your prefiled testimony?

A. Yes.

MS. PRYOR: Chairman Shaw, the court reporter

has been provided a copy of the prefiled direct testimony and I now ask that Mr. Valle's direct testimony be copied into the record as if given here today.

CHAIRMAN SHAW: So marked.

(Whereupon, the prefiled direct testimony of Mr. Valle follows:)

STATE OF GEORGIA

BEFORE THE

GEORGIA PUBLIC SERVICE COMMISSION

In Re:

Georgia Power Company's	**)**	
Application for the Certification	**)**	**Docket No. 56298**
of Capacity from the 2029-2031	**)**	
All-Source RFP	**)**	

In Re:

Georgia Power Company's	**)**	
Application for the Certification	**)**	**Docket No. 56310**
of Capacity Supplemental Resources	**)**	

DIRECT TESTIMONY OF

FRANCISCO VALLE

SEPTEMBER 17, 2025

DIRECT TESTIMONY OF
FRANCISCO VALLE

IN SUPPORT OF GEORGIA POWER COMPANY'S APPLICATION FOR THE CERTIFICATION OF THE 2029-2031 ALL-SOURCE CAPACITY RFP POWER PURCHASE AGREEMENTS AND COMPANY-OWNED PROPOSALS
DOCKET NO. 56298

AND

GEORGIA POWER COMPANY'S APPLICATION FOR THE CERTIFICATION OF SUPPLEMENTAL RESOURCES FOR 2028 – 2031 CAPACITY
DOCKET NO. 56310

I. INTRODUCTION

Q. PLEASE STATE YOUR NAME, TITLE, AND BUSINESS ADDRESS.

A. My name is Francisco Valle. I am the Director of Forecasting and Analytics for Southern Company Services ("SCS"). My business address is 241 Ralph McGill Boulevard N.E., Atlanta, Georgia 30308.

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

A. I graduated from the Universidad Técnica Federico Santa María in Valparaíso, Chile in 1997 with a degree in Electrical Civil Engineering. I also hold a Master of Business Administration from Emory University's Goizueta Business School.

I joined Southern Company in 1997 as a Planning Analyst at Edelnor S.A., a subsidiary of Southern Energy Inc., in Santiago, Chile. In 2001, I moved to Atlanta to join Mirant Corporation, where I held multiple roles of increasing responsibility in system planning and market development and gained extensive experience modeling power pools in the United States and valuing generation technologies and demand response ("DR"). Since then, I have worked at SouthStar Energy Services, a subsidiary of Southern Company Gas, and served as the Manager of Risk Analysis Services, a group within the SCS Finance

organization. In this role, I was responsible for supporting the selection of optimal financing strategies for Southern Company's debt and equity portfolios and for providing business units with quantitative analysis and risk mitigation strategies. I also supported Georgia Power Company's ("Georgia Power" or the "Company") Market Planning by providing revenue, load forecasting, and risk analysis; performing weather revenue variance analysis; reviewing features of load forecasting models; and more.

In September of 2021, I joined Georgia Power as Director of Market Planning. In this role, I led Georgia Power's Forecast and Profitability & Economic Analysis teams, which produced, among other things, the annual peak demand, energy, and revenue forecasts, as well as profitability evaluations of Demand Side Management ("DSM") programs. In March of 2023, I assumed my current position as Director of Forecasting and Analytics for SCS. I lead the forecasting team that provides load forecasting services to SCS, Georgia Power, and Mississippi Power Company as well as the quantitative team that supports capital market operations and provides operational analytics.

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

A. Yes. I testified in Docket No. 56002, Georgia Power's 2025 Integrated Resource Plan ("IRP"); Docket No. 56003, Georgia Power's 2025 Application for the Certification, Decertification, and Amended Demand Side Management Plan; Docket No. 55378, Georgia Power's 2023 IRP Update; Docket No. 44160, Georgia Power's 2022 IRP; and Docket No. 44161, Georgia Power's 2022 Application for the Certification, Decertification, and Amended Demand Side Management Plan.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. As agreed to between Public Interest Advocacy Staff ("PIA Staff"), Georgia Power, and other stipulating parties in the 2025 IRP Stipulation and consistent with the Commission's Final Order in Georgia Power's 2025 IRP, on September 17, 2025, Georgia Power filed its Budget 2026 ("B2026") Load and Energy Forecast ("B2026 Load Forecast") in Docket

Nos. 56298 and 56310 to inform the Commission's consideration of the necessary generation resources to meet capacity needs in 2028 through 2031. My testimony supports Georgia Power's B2026 Load Forecast, and I incorporate the B2026 Load Forecast into my testimony by reference.

Compared to the forecast in the 2025 IRP, the B2026 Load Forecast utilizes the same underlying methodologies for both the organic and large load components of the forecast with updated information to incorporate the latest data and economic trends. The resulting B2026 Load Forecast supports Georgia Power's capacity need and request to certify approximately 9,900 megawatts ("MW") of necessary generation resources through 2031.

Q. HOW IS THE REST OF YOUR TESTIMONY STRUCTURED?

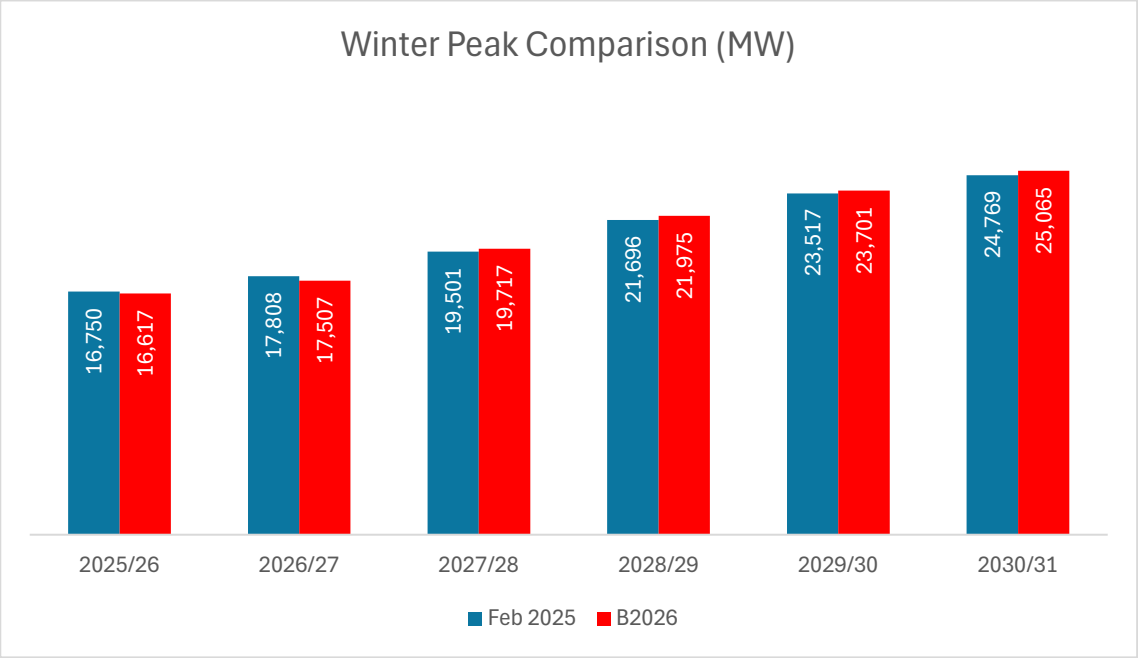
A. The remainder of my testimony is organized as follows:

- Section II provides an overview of the Company's Load Forecast Methodology including the Load Realization Model ("LRM").
- Section III discusses the February 2025 Load Forecast, refinements to the Company's large load assumptions, and the results of the B2026 Load Forecast.
- Section IV details the updated capacity needs based on the B2026 Load Forecast and confirms the need for capacity additions.

Q. PLEASE SUMMARIZE YOUR TESTIMONY.

A. Georgia's prospects for robust economic growth shown in the Company's Commission-approved 2025 IRP is expected to continue. As shown in Figure 1, the Company's B2026 Load Forecast shows Georgia Power's winter peak demand for 2030/3031 has increased by approximately 300 MW to reflect 8,448 MW of load growth over the next 5 years.

Figure 1: 5-year Load Forecast Comparison (Winter Peak)



Large load economic development activity in the state continues to have the greatest impact on the Company's forecasted peak demands, and the Company's disciplined practice of risk adjusting large load customer data continues to serve the state's long-term energy planning efforts well. Over the past two years, since the Company adopted the LRM, Georgia Power has continued to refine the load forecast inputs and risk adjustments based on customer feedback, including those that have: (1) fallen out of the large load pipeline (and correspondingly the load forecast) due to project cancellations; (2) modified their load ramps to start or increase at a different time and pace; or (3) entered the pipeline as new potential customers.

Following the implementation of additional customer protections through the Commission's approval of updates to Georgia Power's Rules and Regulations earlier this year, potential large load customers have more stringent requirements to remain active in the Company's long-term development pipeline and ultimately be accounted for as incremental load in the Company's risk-adjusted load forecast. Taking all this into account, the Company's pipeline of potential and committed large load customers continues to

grow. While load growth in the near term is less than previously forecasted, customer demand remains strong, and Georgia Power's risk-adjusted load forecast has increased for the next five years and over the 20-year forecast horizon. As illustrated in Figure 1 above, the B2026 Load Forecast supports the Company's request in these two dockets for 9,900 MW of capacity resources to support increasing customer needs while continuing to support economic development growth throughout Georgia.

II. LOAD FORECAST OVERVIEW

Q. PLEASE DESCRIBE HOW THE COMPANY DEVELOPED THE ORGANIC FORECAST.

A. The Company's long- and short-term organic forecasts, which forecast load and energy for the residential, commercial, industrial, governmental, and MARTA customer groups, were developed using well-established econometric techniques that have been used in prior forecasts approved by the Commission. As part of the B2026 Load Forecast, the Company divided the commercial class into two segments – organic data centers and all other categories (e.g., offices, schools, etc.). This methodology includes careful examination of key demographic and economic variables that are significant drivers of energy consumption. In addition, the Company uses external adjustments to account for new industries and trends not reflected in historical data.

Q. HOW DOES THE COMPANY ACCOUNT FOR LARGE LOADS IN ITS FORECAST?

A. Consistent with the approach used in the 2023 IRP Update and the 2025 IRP, the Company continues to risk adjust its organic forecast using the LRM to account for the impact of large load projects on the load forecast. This risk adjustment process does not assume that all projects within the large load economic development pipeline—or even the full announced load of committed projects—will materialize. The Company's B2026 Load Forecast accounts for uncertainties related to new large load projects, including factors such as state selection, electric provider selection, project delays, and load materialization.

In addition, the Company continues working directly with customers to better understand their specific needs in terms of electric service and project timing. The LRM evaluates thousands of potential combinations of existing and potential economic development loads, which are then sorted and ranked to create a probability distribution. This probability distribution helps Georgia Power assess the likelihood of the loads it will need to serve. The LRM output is the basis for the large load external adjustment applied to the Company's organic load forecast. The results from the LRM support the external adjustment applied to the organic commercial and industrial load and energy forecasts.

Q. WHAT TYPES OF UNCERTAINTY ARE ACCOUNTED FOR IN THE RISK-ADJUSTED LOAD FORECAST?

A. The LRM adjusts the Company's load forecast for three types of uncertainty: (1) success or failure; (2) degree of materialization; and (3) project delay.

Q. PLEASE ELABORATE ON THE PROJECT SUCCESS OR FAILURE UNCERTAINTY.

A. In the Company's risk-adjusted forecasting process, project success depends on a series of customer decisions that could impact the customer ultimately taking service from Georgia Power pursuant to a large load contract. First, the Company analyzes whether the potential customer will select Georgia as the state for its project location – this is the P1 probability. Georgia Power assigns each potential customer with a P1 probability based on whether the customer has obtained site control. Second, the Company analyzes the likelihood of the potential customer signing a contract with Georgia Power – this is the P2 probability. In prior iterations, this commitment to Georgia Power was represented by the likelihood of the customer submitting a request for electric service ("RFS"). The Company has shifted the commitment likelihood from the likelihood of signing a RFS to a stage-based likelihood of signing a Contract for Electric Service ("CES"). As described in more detail below, the Company assigns and continually updates a customer's P2 probability based on the project's stage within the Company's internal review process as the project advances and the customer moves closer to signing a CES with Georgia Power. A project that has

advanced further through the internal review process (e.g., timeline review, transmission analysis, etc.) is assigned a higher likelihood for its P2 probability. Third, the Company evaluates the likelihood of a customer reaching commercial operation – this is the P3 probability. This probability is used to adjust for the risk that a project may fail after contract signing due to circumstances such as economic downturns, financial distress, a shift in business strategies, and other factors.

Q. HOW DOES THE COMPANY DEFINE LOAD MATERIALIZATION?

A. Georgia Power defines load materialization as the percentage of load (MW or gigawatts ("GW")) at the meter at full operation compared to the customer's announced load (e.g., the sum of all planned interconnected equipment behind-the-meter or design capacity).

Q. HOW DOES THE COMPANY ACCOUNT FOR LOAD MATERIALIZATION IN THE LRM?

A. Georgia Power assumes that when a customer reaches full operations (maximum load), the load at the meter will be lower than the announced load. The Company assigns a low, mid, and high percentage of materialization for each segment of large load customers under review. As initially filed in the 2025 IRP, the Company evaluated the likelihood of materialization for three segments: (i) commercial – data centers and cryptocurrency customers; (ii) commercial – non-data center and non-crypto currency customers; and (iii) industrial customers. As described in more detail below, beginning with the February 2025 Load Forecast, the Company included an additional differentiating factor for data centers and cryptocurrency projects, which considers whether there is an identified end user or one is still being sought. Data center developers, data center colocators with no tenants, and cryptocurrency operations are now represented at a lower materialization level. Accordingly, the Company has adjusted the assigned materialization percentages for these types of projects in the B2026 Load Forecast.

Q. HOW DOES THE COMPANY CONSIDER PROJECT DELAY IN THE LRM RISK ADJUSTMENT?

A. Project construction delays are both normal and expected. As such, the Company evaluates whether each customer in the forecast will reach commercial operation by its requested commercial operation date. The LRM assumes a range of delays in months to account for the possibility that commercial operation might occur later than requested by the potential customer. If the customer provides new information indicating that its load may now manifest later than originally requested, the Company will apply the aforementioned range of delays to the latest available information.

Q. HOW DOES THE COMPANY USE THESE PROBABILITIES TO DETERMINE WHAT LOAD IS ASSUMED IN ITS FORECAST?

A. Georgia Power combines each of the categories of uncertainty using Monte Carlo techniques to generate a distribution of project outcomes ranging from total failure to complete success. The Company then uses the midpoint of that range, P50, as the LRM adjustment to its forecast. Therefore, an evaluated fraction of the total economic pipeline is included in the LRM portion of the Company's forecast. The Company then adds its organic forecast to the LRM risk-adjusted forecast to create the Load and Energy Forecast.

Q. DOES THE COMPANY MAKE ANY OTHER ADJUSTMENTS TO BASELINE LOAD AND ENERGY PROJECTIONS?

A. Yes. In addition to the large load adjustment discussed above, the Company adjusts its Load and Energy Forecast for DSM programs and actions, electric vehicles, and behind-the-meter solar. The adjustments were previously addressed in detail in Technical Appendix Volume 1 of the 2025 IRP in Docket No. 56002. These additional adjustments have been accepted and are consistently being applied in the Budget 2026 Load Forecast.

III. LOAD FORECAST

February 2025 Load Forecast

Q. PLEASE PROVIDE AN OVERVIEW OF THE FEBRUARY 2025 LOAD AND ENERGY FORECAST INCLUDED WITHIN THE COMPANY'S 2025 IRP REBUTTAL TESTIMONY IN DOCKET NO. 56002.

A. The Company's February 2025 Load Forecast continued to project extraordinary customer load growth stemming from substantial economic development in Georgia compared to the B2025 Load and Energy Forecast included in the Company's original 2025 IRP filing. The original B2025 Load Forecast was finalized in August 2024 and was based on economic development from Q2 2024. By comparison, the February 2025 Load Forecast, which updated the LRM with more recent information, was based on economic development data as of February 2025. From Q2 2024 to February 2025, the Company's large load pipeline more than doubled, increasing from 22,763 MW to 48,381 MW. In addition, the composition of the large load pipeline changed such that the amount of load from data center developers and data center co-locators without tenants increased relative to other segments.

In the February 2025 Load Forecast, the Company introduced two key changes to enhance the accuracy of the load forecast:

(1) **Revised Materialization Assumptions**: The Company began to differentiate types of data center projects based on their likelihood of materialization. As such, colocators without committed tenants and data center developers are modeled at lower materialization levels compared to hyperscalers and colocators with committed tenants, which additionally accounts for the relative level of certainty around load materialization.

(2) **Commitment Likelihood Adjustment**: Following the Commission's approval of the Company's revised Rules and Regulations, which strengthens the assurance that large

load customers (100 MW or greater) will be responsible for the incremental cost for Georgia Power to serve them, the Company refined its customer intake and evaluation process, placing additional emphasis on the likelihood of signing a CES in addition to the RFS. This change adds even more certainty to the forecast by focusing on the CES, which is a more definitive stage of customer commitment and more reliable indicator of load materialization, than an RFS.

As previously discussed in the Company's 2025 IRP Rebuttal Testimony, these adjustments incorporated recent market insights and refined the LRM to better address the complexities of projects, particularly in the data center sector.

B2026 Load Forecast

Q. PLEASE PROVIDE AN OVERVIEW OF THE B2026 LOAD FORECAST RESULTS AND HOW THEY COMPARE TO THE B2025 AND FEBRUARY 2025 LOAD FORECASTS.

A. As shown in Table 1 and Figure 2 below, the B2026 Load Forecast winter peak demand decreases slightly in the near term, converges in 2029 to peak demand estimates similar to those previously forecasted, and then increases through the winter of 2030/2031 and beyond. When the 2025 IRP was filed, the Company projected load growth of 8,205 MW from the winter of 2024/2025 to the winter of 2030/2031, and 7,577 MW from the winter of 2025/2026 to the winter of 2030/2031. With the B2026 Load Forecast, the Company now anticipates load growth of 8,448 MW between the winter of 2025/2026 and the winter of 2030/2031. Table 2 identifies the Company's projected summer peak demand for the same time periods for comparison.

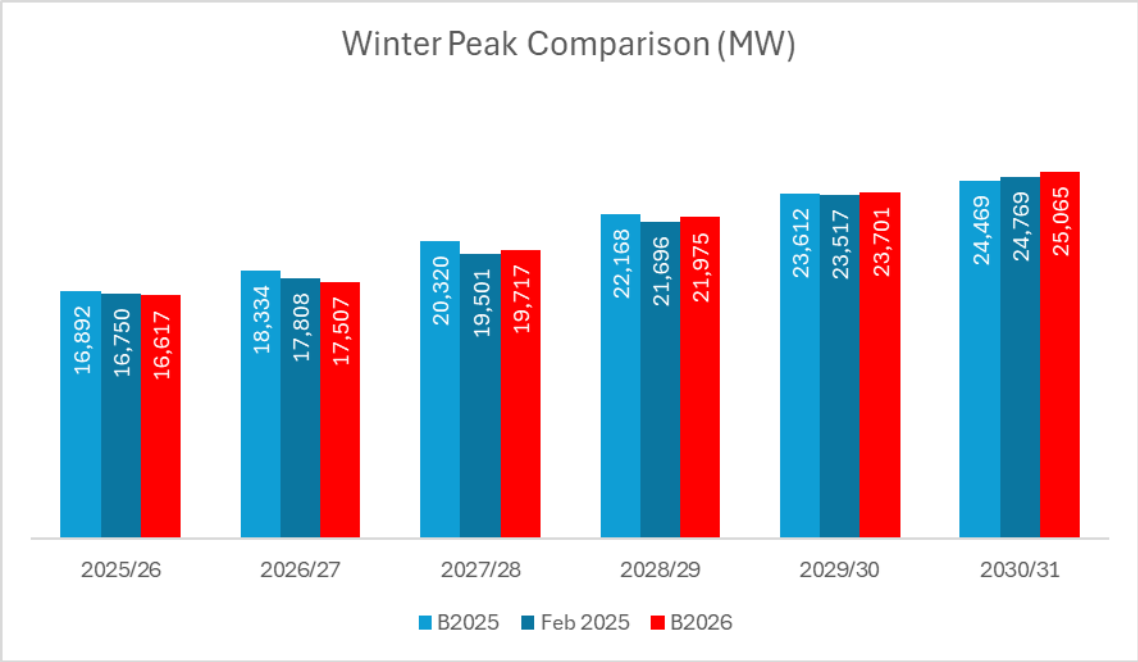
Table 1: Projected Winter Peak Demand

Winter Peaks	B2025 Load Forecast	February 2025 Load Forecast	B2026 Load Forecast
2025/2026	16,892	16,750	16,617
2026/2027	18,334	17,808	17,507
2027/2028	20,320	19,501	19,717
2028/2029	22,168	21,696	21,975
2029/2030	23,612	23,517	23,701
2030/2031	24,469	24,769	25,065

Table 2: Projected Summer Peak Demand

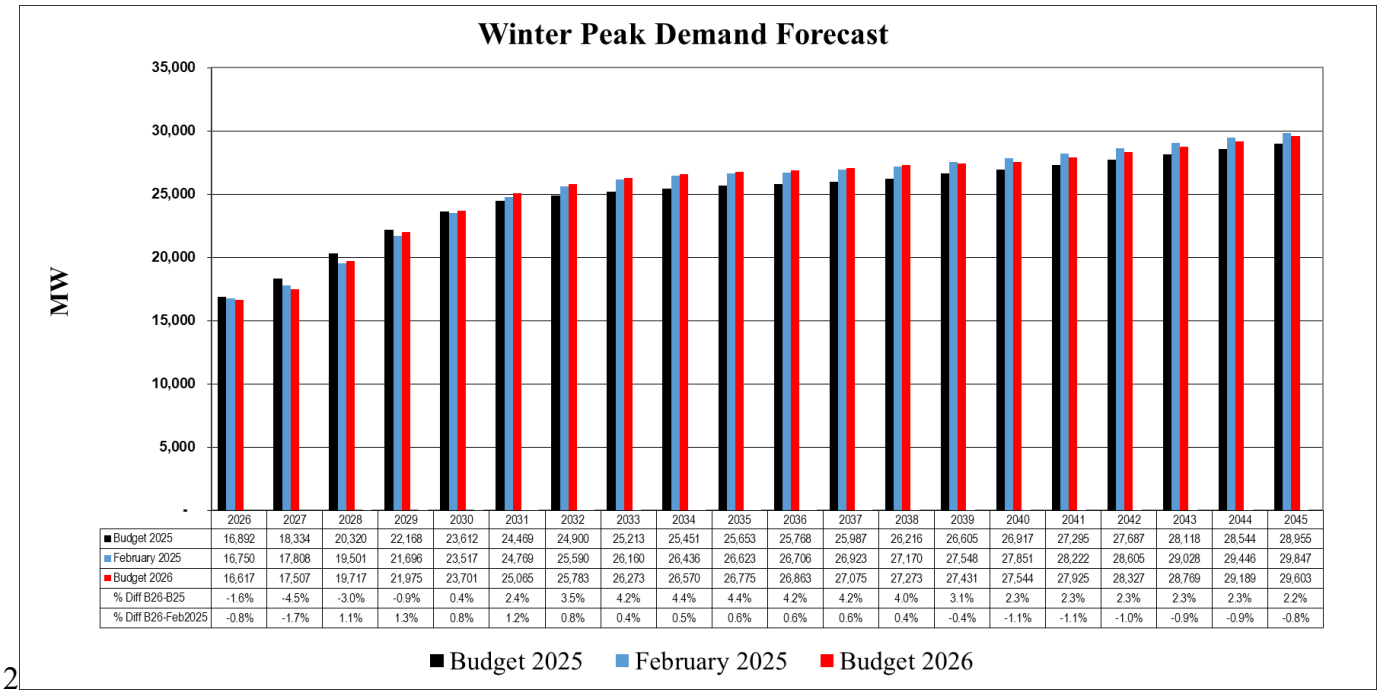
Summer Peaks	B2025 Load Forecast	February 2025 Load Forecast	B2026 Load Forecast
2026	18,770	18,480	18,151
2027	20,552	19,971	19,796
2028	22,730	21,981	22,101
2029	24,621	24,373	24,229
2030	25,841	25,934	25,845
2031	26,554	27,081	26,979

Figure 2: Winter Peak Comparison



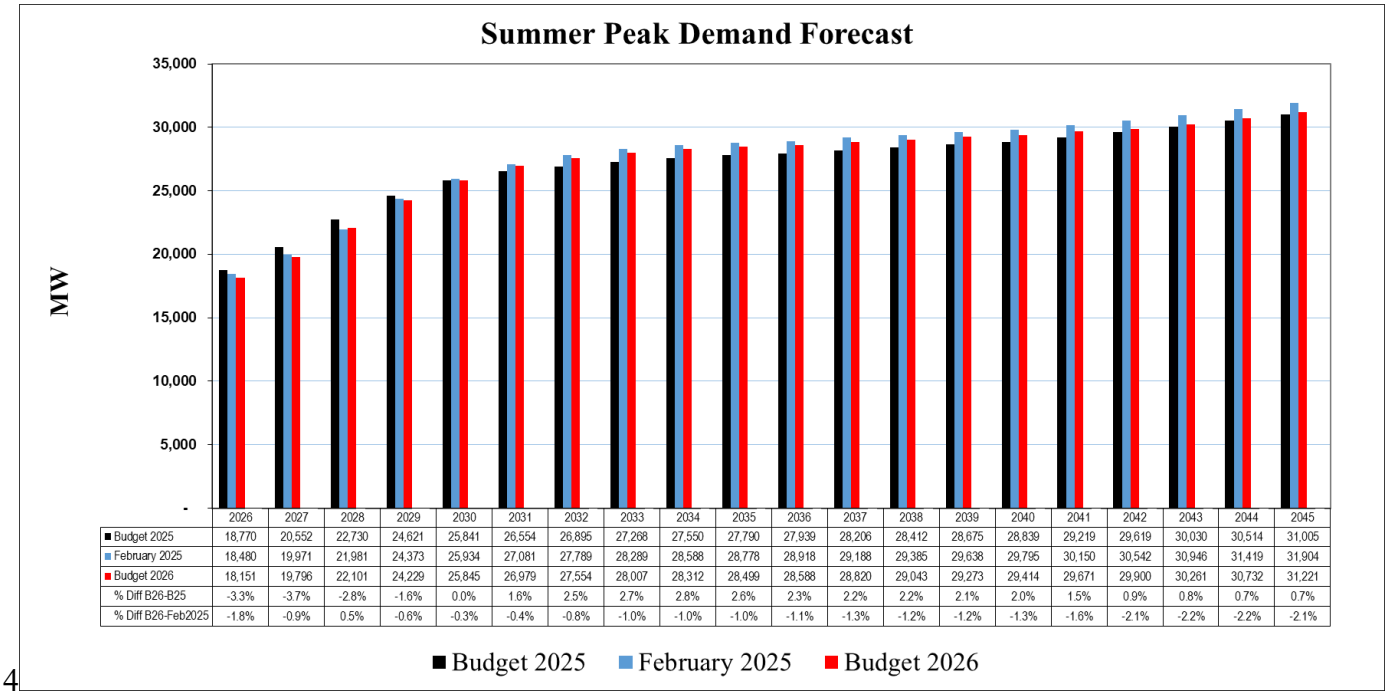
A comparison of projected peak demands from the 2025 IRP, the February 2025 Load Forecast, and the B2026 Load Forecast for the 20-year period spanning the winter of 2025/2026 (denoted as 2026) through the winter of 2045/2046 (denoted as 2046) is provided in Figures 3 and 4 below for the winter and summer seasons, respectively.

Figure 3: Winter Peak Demand Through 2045



	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Budget 2025	16,892	18,334	20,320	22,168	23,612	24,469	24,900	25,213	25,451	25,653	25,768	25,987	26,216	26,605	26,917	27,295	27,687	28,118	28,544	28,955
February 2025	16,750	17,808	19,501	21,696	23,517	24,769	25,590	26,160	26,436	26,623	26,706	26,923	27,170	27,548	27,851	28,222	28,605	29,028	29,446	29,847
Budget 2026	16,617	17,507	19,717	21,975	23,701	25,065	25,783	26,273	26,570	26,775	26,863	27,075	27,273	27,431	27,544	27,925	28,327	28,769	29,189	29,603
% Diff B26-B25	-1.6%	-4.5%	-3.0%	-0.9%	0.4%	2.4%	3.5%	4.2%	4.4%	4.4%	4.2%	4.2%	4.0%	3.1%	2.3%	2.3%	2.3%	2.3%	2.3%	2.2%
% Diff B26-Feb2025	-0.8%	-1.7%	1.1%	1.3%	0.8%	1.2%	0.8%	0.4%	0.5%	0.6%	0.6%	0.6%	0.4%	-0.4%	-1.1%	-1.1%	-1.0%	-0.9%	-0.9%	-0.8%

Figure 4: Summer Peak Demand Through 2045

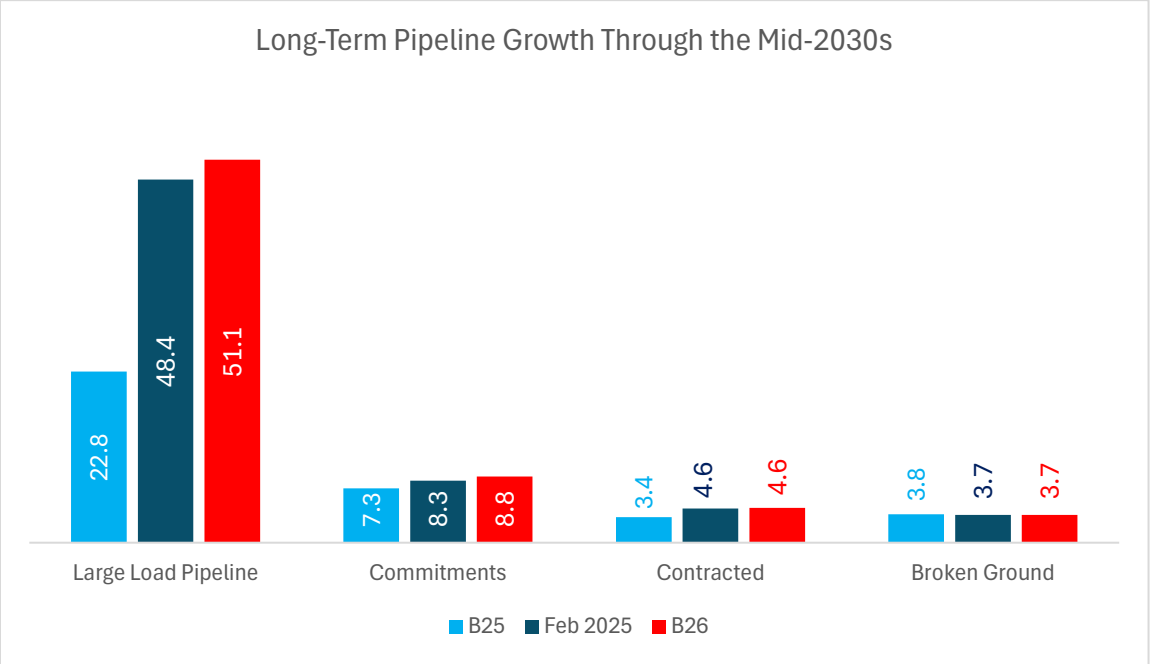


	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
Budget 2025	18,770	20,552	22,730	24,621	25,841	26,554	26,895	27,268	27,550	27,790	27,939	28,206	28,412	28,675	28,839	29,219	29,619	30,030	30,514	31,005
February 2025	18,480	19,971	21,981	24,373	25,934	27,081	27,789	28,289	28,588	28,778	28,918	29,188	29,385	29,638	29,795	30,150	30,542	30,946	31,419	31,904
Budget 2026	18,151	19,796	22,101	24,229	25,845	26,979	27,554	28,007	28,312	28,499	28,588	28,820	29,043	29,273	29,414	29,671	29,900	30,261	30,732	31,221
% Diff B26-B25	-3.3%	-3.7%	-2.8%	-1.6%	0.0%	1.6%	2.5%	2.7%	2.8%	2.6%	2.3%	2.2%	2.2%	2.1%	2.0%	1.5%	0.9%	0.8%	0.7%	0.7%
% Diff B26-Feb2025	-1.8%	-0.9%	0.5%	-0.6%	-0.3%	-0.4%	-0.8%	-1.0%	-1.0%	-1.0%	-1.1%	-1.3%	-1.2%	-1.2%	-1.3%	-1.6%	-2.1%	-2.2%	-2.2%	-2.1%

Q. PLEASE DISCUSS THE PRIMARY FACTORS DRIVING THE CHANGES TO PEAK DEMAND IN THE B2026 LOAD FORECAST.

A. As with the prior two load forecasts, the large load economic development activity in the state continues to have the greatest impact on the Company's peak demands. Since the February 2025 Load Forecast, several potential customers: (1) have entered the large load pipeline; (2) modified their load ramps, thereby impacting the large load pipeline; or (3) cancelled projects and thus been removed from the large load pipeline and forecast. As shown in Figure 5, and in support of the B2026 Load Forecast, the long-term large load pipeline grew by approximately 2.7 GW between February 2025 and August 2025 from 48.4 GW to 51.1 GW.

Figure 5: Long-Term Pipeline Growth Through the Mid-2030s



Q. DID THE COMPANY MAKE ANY CHANGES TO THE UNDERLYING METHODOLOGY EMPLOYED TO DETERMINE THE LOAD FORECAST AS PART OF ITS B2026 LOAD FORECAST?

A. Yes. The Company continues to forecast load and energy for the residential, commercial, industrial, governmental, and MARTA customer groups using its Commission-approved long- and short-term methodologies for the organic forecast, as adjusted for large loads, electric vehicles, behind-the-meter generation, and DSM. However, as mentioned above, the Company separated organic (non-large load) data center load from other commercial customers (e.g., offices and schools) in the organic forecast. Consistent with the approach taken in the 2023 IRP Update and the 2025 IRP, the LRM is used to risk adjust the load forecast based on the likely impact of large load customers[1] in the economic development pipeline. Other than noted above, the central components of the organic forecast and LRM methodologies are the same as was presented in the 2025 IRP.

Q. DID THE COMPANY MAKE ANY CHANGES TO THE INPUTS TO THE LOAD REALIZATION MODEL TO FORECAST LARGE LOAD ADDITIONS TO THE SYSTEM?

A. Yes. Consistent with the development of previous forecasts, the B2026 Load Forecast includes new customer information, such as new customers, updated load ramps, and revised project timing. Projects that do not comply with Commission-approved Rules and Regulations, as revised, have been withdrawn or placed on hold.

Q. HOW DOES THE COMPANY AVOID DOUBLE COUNTING LARGE LOADS IN THE LRM AND ORGANIC FORECAST?

A. The Company separately accounts for large load customers in the LRM component of its forecast. Large load customers are commercial customers 115 MW or greater and industrial

[1] For purposes of forecasting and planning for large load customers, the Company defines "large load" to be industrial load greater than or equal to 45 MW and commercial load greater than or equal to 115 MW. Note, this is a different threshold than "large load" as used in the Georgia Territorial Electric Service Act, O.C.G.A. § 46-3-1 et. al.

customers 45 MW or greater. Because these customers are delineated by this threshold, the Company excludes them from the organic forecast so as not to extrapolate the impact or growth of existing facilities already in the forecast. As such, large load customers cannot be double counted as part of the organic forecast because they are intentionally excluded from it.

Q. WILL LARGE LOADS BE MERGED INTO THE ORGANIC FORECAST?

A. No. Even after a large load customer goes in service, the Company anticipates keeping the large load forecast separate from the organic forecast to ensure that the trends and projections for large load customers can continue to be monitored and adjusted separately from the rest of the commercial class. The Company will continue to use the LRM as an external adjustment to the organic forecast as described herein.

Q. WERE THERE ANY OTHER UPDATES TO THE B2026 LOAD FORECAST COMPARED TO WHAT WAS INCLUDED IN THE FEBRUARY 2025 LOAD FORECAST?

A. Yes. The B2026 Load Forecast has been adjusted to reduce the peak demand forecast by the projected demand reduction resulting from the Company's DSM case approved by the Commission in the 2025 IRP. Also, the organic forecast was updated for the B2026 Load Forecast based on updated economic data and customer information.

Q. DOES THE COMPANY EXPECT ITS LOAD PROJECTIONS TO CHANGE?

A. Yes. Consistent with prior testimony in the 2023 IRP Update and the 2025 IRP, the Company's load projections will change as economic conditions change, and current economic conditions suggest that Georgia continues to be attractive to new business. Also, the Company produces a load forecast at least annually as part of the annual planning process, which by design incorporates updated economic and customer information. The Company continues to monitor updates in the large load pipeline and will revise its forecast as needed based on new information as it becomes available. The Company has committed

to continuing to prepare and file the large load economic development reports, which will show quarterly views on how the economic development pipeline evolves. The Company does not expect any potential load forecast changes to substantially impact the resources requested in this filing.

Q. DID THE COMPANY MEET WITH COMMISSION STAFF TO COLLABORATE ON THE LOAD FORECAST FOLLOWING THE 2025 IRP?

A. Yes. Prior to filing the B2026 Load Forecast and this testimony, the Company met with Commission Staff three times to discuss the Company's refinements to its load forecast process and assumptions and to consider Staff's feedback and proposed revisions to the load forecast. The Company will continue to meet with Commission Staff during this proceeding to further collaborate and refine the load forecast.

Q. CAN YOU PROVIDE A STATUS UPDATE ON THE COMPANY'S LARGE LOAD CONTRACTS?

A. Yes. Georgia Power remains in active negotiations with multiple large load customers representing several gigawatts of load. Since finalizing the load information used in the B2026 Load Forecast, the Company achieved new milestones with certain large load customers. In late August, two large load customers, representing 2.2 GW of announced load, executed Requests for Electric Service. This load is in addition to the 8.8 GW of announced load commitments shown in Figure 5 above. In September, Georgia Power reached agreements to execute Contracts for Electric Service with two large load customers, totaling nearly 1 GW of announced load.[2] The Company provided copies of the two contracts and all supporting documents to the Commission Staff for review. This load is in addition to the 4.6 GW of announced contracted load in Figure 5 above. The Company anticipates that additional execution-ready contracts will be filed with the Commission

[2] One customer advanced through the Request for Electric Service to final Contract for Electric Service execution in this timeframe and is included in both the 2.2 GW and almost 1 GW calculations.

during this proceeding for Staff review in accordance with the process set forth in Docket No. 44280.

III. CAPACITY NEEDS AND REQUEST FOR CERTIFICATION

Q. DOES THE B2026 LOAD FORECAST SUPPORT GEORGIA POWER'S PROJECTED CAPACITY NEEDS AND CORRESPONDING REQUEST FOR CERTIFICATION IN THIS DOCKET?

A. Yes. The B2026 Load Forecast supports the Company's certification request and the need for approximately 9,900 MW of generation resources through 2031. The resources for which Georgia Power is seeking certification align with the projected load growth and economic development in Georgia, and certification of these resources will help ensure Georgia Power can continue to meet the increasing energy needs of our customers and our state.

Figure 6 below updates the Company's projected capacity needs based on the B2026 Load Forecast, which demonstrates the need for all the resources for which the Company has requested certification, as well as additional summer and winter capacity needs through 2029/2030.

Figure 6: Projected Capacity Needs (MW) – February 2025 and Budget 2026 Load Forecast

Year	Winter - February 2025 Load Forecast	Winter - Budget 2026 Load Forecast	Year	Summer - February 2025 Load Forecast	Summer - Budget 2026 Load Forecast
2024/2025	(637)	-	2025	(999)	-
2025/2026	(1,068)	(1,237)	2026	(1,173)	(1,592)
2026/2027	(1,364)	(1,743)	2027	(729)	(969)
2027/2028	(676)	(515)	2028	307	301
2028/2029	(230)	114	2029	1,935	1,726
2029/2030	(157)	67	2030	397	251
2030/2031	(1,122)	(757)	2031	(447)	(610)
2031/2032	(176)	60	2032	80	(242)
2032/2033	580	716	2033	713	334
2033/2034	916	1,078	2034	1,066	693
2034/2035	2,936	3,120	2035	3,474	3,097
2035/2036	7,771	7,962	2036	7,795	7,358
2036/2037	8,105	8,290	2037	8,268	7,786
2037/2038	8,742	8,866	2038	8,722	8,270
2038/2039	9,855	9,703	2039	9,666	9,186
2039/2040	10,586	10,195	2040	10,221	9,722
2040/2041	11,149	10,772	2041	10,686	10,069
2041/2042	11,622	11,268	2042	11,151	10,341
2042/2043	12,143	11,812	2043	11,627	10,765
2043/2044	12,656	12,329	2044	12,182	11,316

Notes:

- The "Georgia Power - Budget 2026 Load Forecast" capacity needs are based on the resource assumptions provided in Docket Nos. 56298 and 56310, updated only for the Budget 2026 Load Forecast, which begins in 2026.

- All columns include a correction to Beaver Creek Solar I, LLC to appropriately incorporate the BESS in addition to the solar resource. See the Company's response to STF-PIA-6-1.

IX. CONCLUSION

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes.

BY MS. PRYOR:

Q. Okay. Mr. Valle, on September 18th, did you file or cause to be prefiled in Docket Nos. 56298 and 56310 Georgia Power Company's direct testimony supplemental filing in both public disclosure and trade secret formats?

A. Yes, I did.

MS. PRYOR: For the record, I'd like to identify the public disclosure version of the direct testimony supplemental filing as Exhibit GPC-7 and the trade secret version as GPC-8.

CHAIRMAN SHAW: So marked.

(The documents referred to were marked for identification as GPC Exhibits 7 and 8.)

BY MS. PRYOR:

Q. On September 19th, did you file or cause to be filed in both of these dockets Georgia Power Company's second supplemental filing in both trade secret and public disclosure formats?

A. (Witness Valle) Yes, I did.

MS. PRYOR: Chairman Shaw, for the record, I'd like to identify the public disclosure version of the second supplemental filing as Exhibit GPC-9 and the trade secret version as GPC-10.

CHAIRMAN SHAW: So marked.

(The documents referred to were marked for identification as GPC Exhibits 9 and 10.)

BY MS. PRYOR:

Q. And, Mr. Valle, on October 14th, did you file or cause to be filed in both Dockets 56298 and 56310 Georgia Power's demonstrative exhibit for use in these hearings?

A. (Witness Valle) Yes, I did.

MS. PRYOR: Okay. And, Chairman Shaw, for the record, I'd like that demonstrative exhibit to be marked as GPC-11.

CHAIRMAN SHAW: So marked.

(The document referred to was marked for identification as GPC Exhibit 11.)

MS. PRYOR: With your permission, I'll ask Mr. Grubb to summarize the prefiled testimony of the main panel, followed by Mr. Valle, who'd like to separately summarize his testimony.

CHAIRMAN SHAW: Sure. Go ahead.

MR. GRUBB: Hi, good afternoon, Commissioners. We appreciate the opportunity to be here with you today in support of Georgia Power's application for the certification of the All-Source Capacity Power Purchase Agreements and

Company-Owned Proposals and its application for the Certification of Supplemental Resources for '28 -- 2028 through 2031 capacity.

As demonstrated in both the '23 IRP Update and 2025 IRP proceedings, Georgia continues to be one of the fastest-growing states in the country and is experiencing extraordinary economic development. We view this growth as a significant opportunity, one to foster and enable.

That said, we understand the importance of the ask before the Commission. As agreed to earlier this year in the IRP, the company continues to refine and improve its forecasting of large load customers who seek to do business in Georgia.

Our most recent load forecast, filed in September, continues to project substantial growth through 2031 and beyond. Despite minor reductions in the near-term forecast, the company's projected capacity needs beginning in the winter of 2027 continue to support each and every resource sought for certification in these two proceedings. The resources proposed for certification are a vital part of the company's approach to meeting the growing electricity needs of our state and continue to provide our customers with the reliability they

deserve and expect.

Our testimony discusses the All-Source RFP process; the evaluation and selection of winning resources; the remaining capacity need after the completion of the winter '27/'28 BESS RFP and All-Source RFP; the company's identification and evaluation of supplemental resources, and the benefits these resources are expected to deliver to customers.

Consistent with the Commission's 2022 IRP order, the company conducted the All-Source RFP seeking dispatchable and reliable capacity resources needed in the winter of 2028/2029 through 2030/2031 timeframe. The RFP was developed in accordance with the Commission's RFP rules, with the oversight of Commission staff and the independent evaluator, as well as feedback from the marketplace.

Georgia Power issued the All-Source RFP seeking to procure 8,500 megawatts of capacity resources to cover load growth and PPA expirations, which is the largest competitive procurement the company has ever issued. The company received proposals from almost 15 gigawatts of battery energy storage systems, or BESS, BESS plus-solar,

and thermal resources. The company conducted a comprehensive, fair, and transparent evaluation of the proposals received, as monitored and overseen by staff and the IE.

As a result of the All-Source RFP, the company seeks certification of 7,999 megawatts of dispatchable capacity resources, which include: Four thermal power purchase agreements, or PPAs; nine standalone BESS company-owned proposals, or COPs; two BESS plus solar COPs; and three thermal COPs, totaling five combined cycle units.

As demonstrated in our testimony, the All-Source RFP resulted in the competitive procurement of a diverse portfolio of resource technologies located across the state that will meet the needs of customers. The portfolio is also representative of the company's IRP resource mix studies, as detailed in the recently concluded 2025 IRP, the 2023 IRP Update, and the 2022 IRP. Certification of these resources will continue toward -- contribute towards meeting Georgia Power's capacity needs through 2031 and will further support the economic development and growth in Georgia.

Notwithstanding the success of the All-Source

and winter 2027 and 2028 BESS RFPs, there remain additional capacity needs to be filled. Similar to the approach taken in the 2023 IRP Update, and as followed -- and as for allowed in the Commissioner's -- Commission's RFP rules, the company explored opportunities to leverage additional system length, engage existing marketing resources, utilize sites where surplus interconnection could be used to collocate BESS resources.

Through these efforts, Georgia Power identified an additional 1,886 megawatts of supplemental resources for certification. These supplemental resources are made up of the following four components:

First, there are five BESS PPAs with NextEra Energy Resources, each consisting of four-hour BESS assets that will be paired with an existing NextEra solar facility currently under contract with Georgia Power. This will allow the BESS to shore -- to share a point of interconnection, minimize required transmission upgrades, and enable the BESS to be charged from the adjacent existing solar facility.

Second, the Wadley BESS project is a

260-megawatt BESS facility that will be constructed, owned, and operated by Georgia Power that will be paired with an existing NextEra solar facility under contract with the company. Collectively, these six BESS resources are targeted to be in service by November of 2027 to address the company's capacity needs that were not met through the winter 2027/2028 BESS RFP.

Third, the Tenaska Heard County PPA will deliver over 900 megawatts of capacity from six existing combustion turbines beginning June 1st, 2030, following the expiration of the existing PPA Georgia Power has with the facility.

Finally, the proposed Mississippi Power Company PPA amendment offers Georgia Power access to 50 megawatts for calendar year 2029 under the company's existing PPA, which was approved in the 2023 IRP Update. This PPA amendment enables the company to commit an additional 50 megawatts of existing system resources for the benefit of Georgia Power customers.

The company performed a comprehensive evaluation of these options, including a cost-benefit analysis and a comparison of the prices of the supplemental resources to those

received in the All-Source RFP. Together, this analysis demonstrates that the supplemental resources have value comparable to resources that were selected in the market-based RFP.

The company seeks certification of the supplemental resources as an extraordinary advantage or pursuant to the Commission's discretion. These supplemental resources leverage existing infrastructure and relationships to maximize customer benefits and provide necessary energy and capacity to meet the company's capacity needs in the winter 2027 through the winter of 2030/'31. Certifying these supplemental resources will allow Georgia Power to continue providing reliable and cost-effective service in time to support opportunities for continued customer growth.

Our testimony also outlines the company's cost recovery -- cost recovery and additional sum requests. The requested cost recovery for the PPAs in both the All-Source RFP and the supplemental resource filings is consistent with other PPAs certified by this Commission.

Georgia Power proposes to recover the costs associated with construction of the COP projects

through base rates and will reflect the operating expenses associated with the units in its retail cost of service. The company will continue recovering the cost of the existing solar PPAs through the fuel clause as previously approved by the Commission.

The additional sum request for both the All-Source RFP PPAs and Supplemental Resource PPAs is consistent with additional sums previously approved for capacity resources in the 2022 IRP, the 2023 IRP Update, and the 2025 IRP.

In closing, certifying these resources identified by the company through the All-Source RFP and its supplemental resources process is in the public interest, will provide necessary energy and capacity for Georgia Power's customers, will enable the State of Georgia to continue its record growth, and would allow Georgia to maintain the title of being the best state in the country in which to do business. For these reasons, the company requests that the Commission approve the certification of the entire proposed portfolio.

Thank you for your time and consideration.

MR. VALLE: Good afternoon, Commissioners. I appreciate the opportunity to be here with you

today in support of the company's budget 2026 load and energy forecast. As agreed to in the 2025 IRP stipulation, and consistent with the Commission's final order in the 2025 IRP, the company filed its budget 2026 load forecast to inform the Commission's consideration of the 2028 to 2031 capacity needs that the company seeks to meet through the resources proposed for certification in these proceedings.

Most importantly, the budget 2026 load forecast remains consistent with the forecast filed in the 2025 IRP and continues to support Georgia Power's identified capacity needs and the request to certify approximately 9,900 megawatts of capacity resources in these proceedings.

At its core, the structure and methodology for both the organic and large load components of the budget 2026 load forecast are the same as those used in the 2025 IRP. The organic forecast continues to support the trends and levels indicated in the 2025 IRP, incorporating updated economic data and other relevant factors. Importantly, the methods and models used for the organic forecast have not significantly changed from those applied in the budget 2025 forecast,

ensuring consistency with prior Commission-approved approaches.

Consistent with the approach used in the 2023 IRP Update and the 2025 IRP, the company continues to risk adjust its organic forecast using the load realization model. This is to account for the impact of large loads projects on the load forecast. This risk adjustment evaluates each project's progress through defined stages toward completion and applies stage-specific probabilities of attrition, delay, and partial realization to estimate the load that will ultimately be served at the meter. As a result, only a fraction of the total large load economic development pipeline is included in the large load portion of the company's forecast.

Over the past two years, since the company adopted the load realization model, Georgia Power has continued to refine the load forecast inputs and risk adjustments based on customer feedback and behavior. Following the implementation of additional customer protections through the revisions of the rules and regulations earlier this year, potential large load customers have more stringent requirements to remain active in the

company's long-term development pipeline.

These more demanding requirements were incorporated in the February 2025 and the budget 2026 load forecasts. As a result of applying these revised requirements, approximately 10 gigawatts of potential load that failed to meet the additional criteria has been removed from the budget 2026 pipeline, and another 17 gigawatts has been placed on hold pending compliance.

By placing additional emphasis on the likelihood of signing a contract for electric service in our assessment, which is a more definitive stage of customer commitment and a more reliable indicator of load materialization, we are improving the certainty in our forecast.

Taking all of this into account, the budget 2026 load forecast demonstrates that the company's pipeline of potential and committed large load customers continues to grow. While the near-term load growth is slightly lower than previously forecasted, customer demand remains strong, and Georgia Power's risk-adjusted load forecast has increased for the next five years and over the 20-year forecast horizon. The company's budget 2026 load forecast shows the Georgia Power winter

peak demand for 2030/2031 has increased by approximately 300 megawatts and now reflects 8,448 megawatts of load growth over the next five years.

But our forecast results are not mere theoretical exercises. The company continues to pursue contracts for electric service with large load customers committed to growing their businesses in Georgia. In September alone, the company filed for Commission review three large load contracts for almost 1,900 megawatts. The company remains in advanced stages of negotiations with several other customers and anticipates filing additional large load contracts for Commission review by the end of the year.

For a visual look in what this continued progress looks like, take a look at the demonstrative exhibit we circulated to accompany my testimony. In the chart on the left, you can see the projected 8,448 megawatts of growth in the total company's winter peak demand between 2026 and 2031. To reinforce our confidence in the large load growth, the bars at the right compare the forecasted growth from 2026 to 2031 to the commitments the company has secured to date.

Highlighted on the right side of this demonstrative, the dark blue bar on the bottom represents approximately 6.2 gigawatts from customers with a signed contract for electric service. The green bar on top represents an additional 4.2 gigawatts in customers with signed requests for electric service. Even using unadjusted estimates for these commitments, having approximately 10.4 gigawatts of customer commitments reinforces and surpasses the 8,448 megawatts we have planned in our forecast.

In conclusion, the budget -- the company's budget 2026 load forecast and finalized large load contracts continue to demonstrate that the state's economic development activity has the greatest impact on the company's forecasted peak demands. The State of Georgia is growing, and Georgia Power is well-positioned to contribute to Georgia remaining the best state in which to do business. The company's disciplined practice of risk adjusting large load customer data continues to protect existing customers and serve the company's long-term energy planning efforts well. The budget 2026 load forecast supports Georgia Power's identified capacity needs and the request to

certify approximately 9,900 megawatts of capacity resources in these proceedings.

Thank you so much for your time and for your consideration.

MS. PRYOR: Thank you, Commissioners.

The witnesses are available for questions from the Commission as well as cross-examination.

CHAIRMAN SHAW: Go ahead, Commissioner.

COMMISSIONER ECHOLS: Mr. Grubb, I guess this may be -- may be for you. This is in some ways a little hypothetical.

Let's -- let's say that within the next two years the Trump administration comes with a substantial nuclear package that would be -- be beneficial to customers, that would be -- that would de-risk building, that would provide maybe overrun insurance or something that -- that everyone would sign off on.

How much -- how much flexibility do we have here? I mean, when would be the drop-dead date for us to approve, let's just say, two more AP1000s at either Plant Vogtle or Stewart County since we've already done the site work down there?

Is it -- could it be done in the next IRP or is -- or is that too late? Do we have any

flexibility in here?

MR. GRUBB: Well, I think, Commissioner, you hit on the main point and that's the cost; right?

But we -- we noticed in the IRP that there's a lot of advantages to it. So I think the -- the real timing is going to be how quickly can you deploy it.

I know that there's a -- there's a process upfront that I think the administration is looking to shorten, as well. But we think we could have something on by the late '30s, early '40s, at the latest. And so it's going to just depend on if they can shorten that preconstruction activity.

And so I think when you look at the challenges that we see from a load standpoint, there's sustainability issues from customers, we feel confident in our ability to build gas. But there's a lot of infrastructure to be built for that. I think, as we talked about in the IRP, if the cost aspect can be handled from a risk standpoint, we see a very important role for nuclear in the continuation of growing our fleet.

So I think if -- it depends on what happens. You know, you could -- you could do a request in a 2028 IRP. But, I think, Commissioner, it would

depend on what the administration came out with. And if we needed to move earlier, we possibly could.

COMMISSIONER ECHOLS: So the green --

MR. GRUBB: There's a lot of ifs there. I'm sorry. But, yeah, I agree with you it's something we need to work hard on.

COMMISSIONER ECHOLS: The green bar here represents, I guess, this excess. So I'm assuming that as we go even further, there's -- the bar -- is it going to plane out there, do you think, or do you think the bar is going to continue to grow as we -- as we evaluate load, say, into the mid '30s?

MR. VALLE: Yeah. So the expectation, Commissioner, is that the green section of this bar is going to transform into the dark blue section of the bar. Meaning, all of those customers with a request of service, or most of them, are expected to sign contracts.

Now, there's an additional growth that is coming from perspective customers. So remember that the load realization model, it's a -- it's a -- it's a framework that -- that evaluates customer progressions through times. They're hurdles that need to be clear with the goal of

signing a contract.

And so that progression over time should materialize as an increase. And what you want to see is you want to see this bar being above the forecast that we see because those bars get risk adjusted. Not -- not every contract gets modeled in our -- in our demand at full nominal value. We derate them to adjust for materialization and up -- and level that we have to serve at the meter.

MR. GRUBB: But, Commissioner, I do think that there is -- you know, we're working with customers on through that 2030/2031 time frame. We don't know if that's going to continue beyond it. But I would say I think the ability to deploy good resources, like nuclear, and that load growth kind of go hand and hand.

But we are having discussions with customers. And I think as they see success from the Georgia process, in terms of rules and regs, executing those contracts, and they see how that works, we've had discussions where they're wanting to look at their next phases. And so I think there are absolutely customers thinking about that next mid-'30s, late '30s growth. And as we accommodate the growth now that we're looking at, I think it

helps us continue to be the state that they want to come to.

COMMISSIONER ECHOLS: So back to the hypothetical if -- let's say in '28 we're sitting here -- hopefully we're sitting here. Hopefully I'm sitting here.

Let's say I'm sitting here with my colleagues and we're thinking about 2040, will our coal units be ready for retirement in 2040?

Could the nuclear take the place of the coal that we're now dependent on as we get into the 2040s?

MR. GRUBB: Yeah. So there's a -- there's a few things there. I think it's a great question. The one thing is it's going to depend on what environmental rules we continue to see for the coal units.

As we know, in the 2025 IRP, there's a lot of value extending them because you were having to construct replacement. And so I think it's going to depend on what the load forecast does.

I do think, though, when you look at building and deploying nuclear, if you have the ability, if it's not solely supported by load growth, to have the ability to transition out of some other units,

you have that ability to have that capacity need.

And so I think that is one thing that we will be thinking about. We already are thinking through is when you could have nuclear on, what do the economics of those coal units looks like, and could you do a transition. Because they're both -- nuclear is obviously baseloaded. Coal has the ability to run baseloaded. And so that is something that's a consideration.

I'm not sure we'll know all that by '28. I think it's going to depend on some of the rules. But I think that's definitely something as planners we look at is: Can you -- can you transition one to the other? Because you have a need for that, whether it's load driven or not.

COMMISSIONER ECHOLS: Thank you very much.

CHAIRMAN SHAW: All right. I've got a quick question.

You know, listening to all the public comments today, I think that was probably a record number of folks that took the time to show up here. And you can -- you know, that they're very passionate.

And one of the things that was referenced multiple times was -- you know, the terminology

would have been like the -- like the bubble were to bust on all this AI and this load growth that we're experiencing. Nobody can argue that that's the main cause for all of this unprecedented growth, and as you refer to as an opportunity. I agree with you.

But if that were to happen, I mean, just thinking about these new rules that we've adopted that y'all have referenced how strict they are, and obviously we're hearing that across the country that our contracts and our rules are probably the strictest in the country at this point.

MR. GRUBB: Right.

CHAIRMAN SHAW: But I just want to make sure that if that were to happen, the worst-case scenario that this busts, that this Commission maintains the authority to disallow any expenses that the company puts forward for recovery if the load forecast did not mature and did not materialize as you are currently forecasting.

MR. GRUBB: Yes, Mr. Chairman, I think one of the things that I'd add there is, you know, the pipeline is 50,000 megawatts. And so we're projecting about 8,500 megawatts of growth out of that. So we think that is one way we're de-risking

that type of event.

You're correct. You absolutely have cost recovery purview over our actions. I think there's -- there's things we could do that we can adjust as we need to. It depends on when we know that those loads may not be coming.

So -- and we had this in a data request. I mean, one of the things would be if you're building these resources, you reduce your needs for the next RFP, the timing for that RFP. We can actually go and engage customers that we've got planned ramps for their loads.

There are several that are often asking us: Can we move those up earlier? So if there's some customers that are not growing, we can go to the others and advance their growth.

You could pause or delay some of the resources we're building if we had to. You could cancel some if you had. So, you're right, the company and the Commission has actions we could take if it's -- if it declines.

We're confident in it, not that we think it's going to continue for decades at this level. But the level that we're at now and the customers we're talking with and working on contracts with, we feel

confident. But, you're correct, we have actions we can take on the resource side and then you also do, as well.

CHAIRMAN SHAW: You know, when you reference those actions on the resource side, are you mainly -- would the first step be cancellations of PPAs?

MR. GRUBB: No, it wouldn't probably be cancellation of PPAs. I think it would be more that -- when you look at our capacity needs, we have needs that are forecast in '32, '33, '34, and '35. You wouldn't have those needs. So you wouldn't have to run an RFP. You could grow into them some.

And then you could -- you could delay them before they're put into customer rates and plant service. We've done that a few times. I think with McDonough we backed it up one time for those types of things.

So more talk about that than canceling PPAs. There are provisions in the PPAs, I believe, but I don't believe it's just from a load growth --

CHAIRMAN SHAW: What I meant by that is you've PPAs that could either be renewed or not down the road.

MR. GRUBB: Correct.

CHAIRMAN SHAW: And those are coming up sometime -- some of them pretty soon.

MR. GRUBB: Yes. Thank you for that clarification. That's correct.

So there are expiring PPAs that you may not -- if you don't have the need, you don't, you know, recontract with them. And we've had several before we saw this load growth that we had PPAs expire and we didn't have to replace them. We didn't have the capacity need. So that is one of the benefits of a PPA is that you have a certain life on them, that's correct.

CHAIRMAN SHAW: Thank you.

MR. GRUBB: Yes, sir.

CHAIRMAN SHAW: Any other questions from Commissioners?

(No response.)

All right. Public Service Commission.

MR. PAWLUK: Thank you, Mr. Chairman.

CROSS-EXAMINATION

BY MR. PAWLUK

Q. Good morning. Good afternoon.

A. (Witness Grubb) Good afternoon.

Q. Good afternoon, Mr. Grubb, Mr. Looney, Ms. Curylo, Mr. Valle. My name is Justin Pawluk. And I'm

a lawyer here with the Public Service Commission representing the Public Interest Advocacy staff in this All-Source RFP certification hearing.

I wanted to ask you first a few questions about the history of this 2029 to 2031 All-Source RFP because it seems to me that the scope and purpose of this thing has evolved over time.

Don't you think that's fair to say?

A. (Witness Grubb) I would not agree with that. I would say that the RFP has always had and has traditionally always been able to adjust to the capacity in the needs years. So the Commission approved it in the 2022 IRP. The needs in those years were mainly driven by projected coal retirements and PPA expirations. And as we've extended those units, we've still seen the load growth.

So the intent of the RFP has always been to meet the capacity needs at the time of certification for those three years.

MR. PAWLUK: Okay. Mr. Chairman, if it's all right with you, I would like Mr. Dix to approach the panel with what's been marked as Staff Exhibit STF-PIA-1?

CHAIRMAN SHAW: Yes, sir.

(The documents referred to were marked for

identification as PIA Exhibit STF-PIA-1.)

BY MR. PAWLUK:

Q. So, Mr. Grubb, you mentioned that this All-Source RFP was first proposed in the company's 2022 IRP filing. And I'm showing you a page from that, which is page 11-79.

Specifically I wanted to look at the fourth paragraph down from the top of the page, where it says: Lastly, the company's IRP reflects a capacity need in 2029. This capacity need grows sizeably into 2030, 2031, primarily due to natural gas PPA expirations and expected retirements. The company will continue to monitor this need and consider issuing an All-Source RFP to address these capacity needs in the future. Such RFP would provide additional renewable expansion opportunities beyond the 6,000 megawatts identified in the expansion plan.

Do you see where it says that?

A. (Witness Grubb) Yes, I see that.

Q. Okay. And what was the expansion plan that was referred to back in 2022?

A. (Witness Grubb) Well, the expansion plan in the IRP, as the Commission knows, is our resource mix study where we look at in the IRP across all of our different planning scenarios what type of generation is

beneficial for customers. And it identifies -- over the last several IRPs, it's identified a mix of gas resources whether they're CTs or CCs, storage resources and also solar.

And so we do RFPs that -- you know, as this Commission knows, that are for the procurement of renewable resources and we also do capacity RFPs. And so what I've mentioned in my initial answer is those natural gas PPA expirations and expected retirements is what was driving the need.

A. (Witness Looney) I think also it's important to note that this section of the IRP document was specifically related to renewables. And so this wasn't the full discussion or justification of the RFP. It was just an aside that says the All-Source RFP may also be an opportunity to grow renewables beyond what was contemplated.

And as we've demonstrated, we are bringing several hundred megawatts of additional renewables to the All-Source RFP. And so I think that that's an important reminder of what we're reading here.

Q. Thank you, Mr. Looney.

And I think that answers part of my next question was that it really seems like the focus in 2022 was on that 6,000 megawatts of renewables and that this --

the All-Source for 2029 to 2031 was kind of more of an afterthought.

Is that a good way of characterizing it?

A. (Witness Grubb) I disagree 100 percent. The second sentence says: This capacity need grows sizeably into 2030 through 2031 primarily due to natural gas PPA expirations and expected retirements.

And so when you looked at our needs in the '22 IRP, it wasn't driven by load growth alone. It was by those. And that is what the capacity RFP was to replace.

The point at the bottom is by allowing an All-Source, solar could bid in if it's paired with storage. But the intent of every capacity RFP that we've ever done is for dispatchable capacity resources --

Q. Sure.

A. (Witness Grubb) -- which is exactly what this is saying.

Q. But the intent back then was to, as you said, replace expiring natural gas generation PPAs and expected retirements; correct?

A. (Witness Grubb) And there was some load growth in there, as well.

Q. Okay.

A. (Witness Grubb) it's primarily due to this.

Q. Now, those retirements, is that a reference

to the company's plans at the time to retire the remaining coal-generating units at Bowen and Scherer?

A. (Witness Grubb) No. It was -- initially we showed Bowen I and II, but it would have been Gaston -- the four Gaston units, the Scherer III, and Bowen I and II, as well, which you've noticed since the last RFP we've -- we've extended those. But it was those and then it was gas expirations in the '30 time frame from two RFPs.

Q. Okay. But as we discussed, and the Commission approved in the 2025 IRP, the Bowen and Scherer retirements are not being planned for by the company right now; is that correct?

A. (Witness Grubb) That's correct. And the company's driver for requesting the extension of Gaston in the '25 IRP and Scherer III in the '25 IRP was because of the load growth. And so the drivers of those decisions were to help meet needs in these time frames.

Q. Okay. Now, in this paragraph discussing the company's consideration of the possible -- of a possible 2029 to 2031 All-Source RFP, there is no mention of how many megawatts of capacity the company would seek to procure there, is there?

A. (Witness Grubb) No. There would have been projections filed in the IRP. But when we -- when we go

through the RFP process, which we've been doing for decades, we project what the capacities are when we issue the RFP. And what we certify is always based on the capacity needs upon the time of certification.

So the RFP is to address capacity needs in '29, '30, and '31. It's not a set number like a renewable RFP. And a renewable RFP will have a target that we've agreed to in the IRP. We're going to go buy 1,000 megawatts. The RFP seeks to get 1,000 megawatts.

Capacity RFPs are to meet the capacity needs of the company. And those do change throughout the RFP process, but we work with staff and we update those numbers if they're needed.

Q. Okay. And there was also no discussion of what a possible resource mix would look like, is there?

A. (Witness Grubb) Not in this paragraph, except that the IRP would contain resource mix studies that showed a combination of gas units, storage units, and solar. And that is why the RFP documents that are worked on with staff and the market and the IE and approved by the Commission allow for natural gas, and storage, and storage plus solar.

So the expansion plan of the portfolio is not dictated in the initial setup of the RFP. That's always a result of the evaluation and what is bid in.

Q. In general, what is the purpose of conducting an All-Source capacity RFP instead of something more targeted at specific types of generating assets that might reflect, you know, that resource mix that's reflected in the RFPs; either natural gas, simple cycle, combined cycle, or battery storage, or upgrades to existing units, including hydro and natural gas turbines, as was approved in the 2025 IRP?

A. (Witness Curylo) So the All-Source RFP did allow for multiple types of technology to be bid in. Any sort of firm dispatchable capacity was allowed. We did have pro forma documents that were drafted along with staff and IE and approved by this Commission that were four specific technology types: CCs, CT, ESS, and ESS with renewable. But any sort of technology could have bid in and we allow for that in our bid submission process.

Q. I understand that. But instead of doing an All-Source, why not look at what the capacity needs are per resource and then do an RFP for those resources?

A. (Witness Looney) I think the benefit -- the benefit the All-Source provides is it gives you actual market information at the time of the solicitation. And as we've observed over the last two to three years, the market dynamics can change a lot. Prices of different technologies, energy demands on the system, capacity

demands on the system, technology advancement.

All of those things are projected in IRPs, but the actual resource opportunities and pricing is made available through the RFP. And so you can make the appropriate decisions when you collect that information through a well-governed RFP process. And that's what we accomplished with the All-Source RFP.

A. (Witness Grubb) Yeah. That's exactly right. And the expansion plan gives us an indication based on generic pricing, like Mr. Looney is saying, of the resources that we should seek. But you want to know and you want to make available for the market to respond.

If you look 15 years ago, our expansion plans would have showed probably a high percentage of CTs. When we ran RFPs, combined cycles bid in and were much more economically advantageous for customers than CTs because of the market at the time.

So you -- the expansion plan guides what you ask for in an RFP, but you don't dictate what you're going to go get. You're going to let the market respond so that customers get the best benefit.

Q. Right. But don't different types of generation assets perform different functions for the company based on the economics of operating those different assets, including the volatility of fuel costs,

service life, capacity factor, maintenance costs, environmental impacts, and a host of other factors?

A. (Witness Looney) I think it's better to characterize it as a fleet of resources will behave differently based on those things that you mentioned. And so when we have a diverse fleet of resources, we're able to operate economically, efficiently, and reliably through those kind of uncertainties that you layered on there.

And so a given resource may perform a certain service at one point in time, and then the sort of macro influencers can change and the same resource may behave slightly different. And so that's why we really value diversity of resource types because it's a mitigating factor for some of the things that you described. And, again, an All-Source RFP provides the ability to bring a diverse resource set to meet a capacity need at a given time based on what's available in the market.

Q. Well, there is another --

A. (Witness Grubb) And this -- I'm sorry. And Mr. Looney's evaluation will capture all of those in the RFP evaluations.

Q. Okay. I mean, that was what I was about to ask. I mean, isn't that the point of a resource mix study is to determine what an ideal mix of those resources would be economically?

A. (Witness Grubb) The mix study is an indication based on generic pricing of what resources would benefit customers. The RFP is where you capture the true resource selection based on the market and what is developed in there. So the expansion plan does not carve out or dictate the RFP. It guides it. But the RFP is where we identify, evaluate, and deploy the real resources to serve customers.

A. (Witness Looney) And similar to the IRP mix study, we evaluate the RFP resources with several different planning scenarios so that our resource selection list can be demonstrated to be cost-effective and robust over a number of different future uncertainties.

And so that is an element where the mix study and the RFP have some similarities. But as Mr. Grubb mentioned, in the RFP we're dealing with the firm realties of market pricing and opportunities. And in the IRP, we're dealing with generic opportunities, you know, as we understand them to be at the time.

Q. Okay. But the way the resources are ultimately evaluated by the company for competitiveness is on a uniform dollars-per-kilowatt basis; is that correct?

A. (Witness Looney) That's the metric that we use to compare and rank resources. It's really an

indication of net cost to customers, but we do normalize it on a dollar-per-kW as to not introduce any size bias. So that small resources can compete, you know, fairly with large resources and you're really making that kind of unitized decision.

Q. I mean, in terms of evaluation, wouldn't it be a lot easier and more transparent to compare bids that are all for the same resource type, rather than having to make all of those adjustments that you've just mentioned for different service lives, turn equalization adjustments, energy values to come up with that dollars-per-kilowatt metric?

A. (Witness Looney) You know, it may be easier, but that doesn't make it correct. And so I think what we do is we go through a real diligent process to compare different resource types, different term lengths, and find the correct ways to put them on a comparative basis so that we can get a diverse resource pool that serves our customers cost-effectively and reliably.

Q. I mean, wouldn't it also make it easier for bidders and possibly open up the market to more competition if, for example, you know, battery developers knew that they were only bidding against battery projects and not actual gas plants, or thermal resources builders knew that they were only bidding up against thermal

resources, instead of battery installations with much lower capital costs?

A. (Witness Looney) I don't know that it would make it any easier for bidders. I mean, what bidders are asked is to provide their best proposal based on the cost to build and operate their resource. That's what the company does for the company-owned proposals.

And then it's up to the evaluation team to evaluate those appropriately under the collaboration and overview of Commission staff and the independent evaluator. And then, ultimately, we bring those resource selections to the Commission for their approval.

So I think the bidding community is in a really good spot to do what they need to do in an All-Source RFP. Really no different than if they were in a targeted RFP.

Q. And the company is proposing to build five combined cycle gas generations at three different locations; correct?

A. (Witness Grubb) That's correct.

Q. And the bids for those generating units were all made by the company to be owned by the company; isn't that correct?

A. (Witness Grubb) That's correct.

Q. And those were the only bids made in this

RFP to build new thermal units; is that correct?

A. (Witness Grubb) I believe that is correct.

A. (Witness Curylo) That is correct, yes.

Q. So -- so what happened here? Why weren't there more bids?

Are there -- are there no other developers that could have bid in and built new gas units in response to the RFP?

A. (Witness Curylo) We -- we can't comment on what the state of the market is. There's a lot of turbulence in there. In the time that we've seen the All-Source RFP, there's been a lot of demand growth for these types of generating units. But we can't speculate on the reasons why or why not market participants did what they did.

Q. And if other developers and investors don't think that building CCs for Georgia Power is either profitable or economical or a good use of capital, doesn't that indicate that building CCs for Georgia is neither profitable, economical, or a good use of capital by Georgia Power?

A. (Witness Grubb) No. I don't think -- because the market didn't bid in combined cycles does not mean that combined cycles are not still very valuable for customers and absolutely needed. Our generic expansion

plans show that you need gas. We know because of the loads that these large loads are coming. We need energy from our resources.

And so, we can't speak to why the market didn't do it. I do think the fact that the company bid those in and they are crucial for serving customer loads going forward is a benefit of the Commission's process where the company-owned proposals are bid into an RFP. So that if there are technologies that are needed, the company has the opportunity and, in some ways, the obligation to bid those in. And so just because the market did not do it does not mean that they're not economic and definitely necessary to the state.

Q. Now, looking back again to what the company was projecting as a capacity need in 2022, I want to show you what I've marked as Exhibit STF-PIA-2.

MR. PAWLUK: Mr. Chairman, if Mr. Dix could approach.

CHAIRMAN SHAW: Go ahead.

MR. PAWLUK: And this is page 10-68 from the company's 2022 IRP filing.

(The documents referred to were for identification as PIA Staff Exhibit 2.)

BY MR. PAWLUK:

Q. So what does this exhibit show was the

company's projected capacity need for that 2029 to 2031 time period?

A. (Witness Grubb) So this, again, is from the 2022 IRP, which is based on a load forecast that would have been generated in the fall of 2021.

A. (Witness Valle) Correct.

A. (Witness Grubb) And has the resource assumptions we talked about. It's showing the winter need of around 1,034 megawatts, and then 1,467 megawatts in '30, and then 3,723 in 2031.

MR. PAWLUK: Thank you.

I also wanted to show you another exhibit. This one I have marked STF-PIA-3.

Mr. Chairman, if Mr. --

CHAIRMAN SHAW: Sure.

(The documents referred to were marked for identification as PIA Staff Exhibit 3.)

BY MR. PAWLUK:

Q. Now, this should be the Commission's July 29th, 2022 Order on the 2022 IRP. And I don't need you to look at the whole thing.

I mean, there are a lot of components to this order and the stipulation between the company and the staff, aren't there?

A. (Witness Grubb) Yes. I mean, there always

is. The IRP includes all of the required elements for the 20-year plan and other things. So, yeah, the IRP has a lot of moving pieces and components.

Q. So, I mean, just as an example, there was the North Georgia Reliability Plan that was discussed on pages 18 and 19; correct?

A. (Witness Grubb) Yeah.

A. (Witness Curylo) What pages were those?

Q. Eighteen and 19?

A. (Witness Grubb) Yeah. And that was from the transmission plan in the 2022 IRP, which is prior to all the load growth. But, yes.

Q. There was also the authorization for the McGrau Ford battery facility on pages 19 and 20; right?

A. (Witness Grubb) Yes. It was -- that's what -- that was what approved, yes. That's right.

Q. And there was the CARES RFP for 2,100 megawatts of renewables on 23 and 24?

A. (Witness Grubb) Yes.

Q. And there was an RFP for 200 megawatts of DG renewables on page 25?

A. (Witness Grubb) Yep. Which those -- those have --

MS. PRYOR: Objection. This is a matter of Commission record. The witnesses can take note of

it, as can the Commission.

MR. PAWLUK: And that's fine, Mr. Chairman. I was going to move on.

CHAIRMAN SHAW: All right. Go ahead.

MR. PAWLUK: Now, looking at the top of page 23, the order states: Both PIA staff and the company presented testimony that their respective analyses indicate that the company will have resources needed in the 2029 to 2031 time period, with the approval of resources sought in this IRP.

The Commission finds that given the long lead time to build new capacity, the company should initiate an All-Source RFP and the company's need -- for the company's need for the 2029-2031 timeframe.

Do you all see that?

A. (Witness Grubb) Yes.

Q. Okay. Now, unlike the CARES and the GG renewables RFP authorization, the order doesn't specify a number of megawatts for capacity for the company to procure, does it?

A. (Witness Grubb) It does not. As I said earlier, the RFP, when it's initiated, has a projected range of potential capacity, but it's always based on the capacity need at the time of certification.

Q. Okay. So the Commission authorized the All-Source RFP on July 29th, 2022, but the company did not actually file a draft RFP solicitation with the Commission until a year and a half later, on February 26th, 2024; isn't that correct?

A. (Witness Curylo) That is correct.

(The documents referred to were marked for identification as PIA Staff Exhibit 4.)

BY MR. PAWLUK:

Q. I want to show you what I've marked as Exhibit STF-PIA 4, and provide it the court reporter. And this is page 15 of the company's 2023 Integrated Resource Plan Update filed with the Commission on October 27th, 2023. There's a reference to the All-Source RFP at the top of the page. Do you see that?

A. (Witness Valle) Is that the second bullet?

Q. Yeah. The second bullet point.

So that paragraph says, "In the 2022 IRP, the Commission approved an All-Source RFP to meet the company's needs for 2029 through 2031 timeframe. The company plans to initiate this RFP process in early 2024 to petition the Commission for Certification Resources in the second half of 2025. Following completion of the 2025 IRP, this schedule allows new existing ESS, ESS with renewable resource and gas oil fired resources to be

available to address capacity needs for the winter of 2028-29 through winter of 2030-2031."

Do you-all see that?

A. (Witness Grubb) Yes.

Q. Okay. Again, there's no mention here of the amount of megawatts of capacity to procure, is there?

A. (Witness Grubb) No. Again, the capacity needs projected in the IRP were in the IRP, and when we did the RFP, we will update it. That has been the process for capacity RFPs ever since we've been doing them, is they are made to address capacity needs. So you don't restrict a capacity RFP to the megawatt projected need when the RFP is ordered or approved. It's when it's in certification.

So the fact that we didn't talk about the range is because we knew over that period of time those capacity needs could change, and they did. And so that's why there has never been a targeted megawatt RFP number that's mandated out of an IRP order.

A. (Witness Looney) I think it's really a feature of the overall planning process that the company worked with, with this commission, that we're able to modify our solicitations in near real-time. Now, we do that in complete transparency with the Commission staff in our IE, and we publish these tables in all of our IRPs.

The RFP document itself gave an indication of the targeted amount. But what's most important is that we have the flexibility in this regulatory framework to meet the needs, not to over procure or to under procure, and that positions Georgia Power and the state of Georgia to remain very competitive in the economic development space.

Q. I mean, don't you think it would be a good, though, for the Commission to know how many megawatts they're authorizing when they authorize it?

A. (Witness Grubb) The Commission approves the RFP that gives the guidance, and I don't want to speak for the Commission, but the process has been to update that. So when they issued it in 2022, it was based on the needs that were in the IRP update that included coal retirements that we've since extended the lives on because it benefits customers.

The need was lower because it was before the load forecast that we saw that gives us the opportunity to, you know, to foster this economic development. And so they understand that it's based on the needs projected at the time, but the review process takes a year and a half to two. It would not be good for customers to set a number and then wipe -- your dust your hands from it, and two years later procure that amount no matter what.

To Mr. Looney's point, the whole beauty of

the capacity RFP process is it allows you to adjust over that time.

Q. I mean, I guess that's what we're doing right now is we're trying to figure out how many megawatts is needed; is that correct?

A. (Witness Curylo) Well, I do want to go back and just point out that from the beginning of the draft documents that we're put together for the All-Source RFP, it has been stated for the public, for the Commission, for staff, and IE, that we're seeking up to 8500 megawatts. So that's back since February of 2020 -- sorry -- 2024. Our documents have said that we're seeking up to 8500 megawatts. So this is not a surprise what we're coming with at this point. We have done this in full transparency and in cooperation with staff and IE the entire way.

A. (Witness Grubb) But I would agree that the Commission's processes and methods allows us to adjust to all of this. So you have IRPs. We came to this Commission with the IRP update, which is allowed by Commission rule, because things had shifted and things had changed. And so that process that this Commission allows allowed us to deploy resources to meet a change in load forecast, based on economic development. We've extended units. We've brought things in the 2025 IRP to help meet

this, these needs. And we are finishing this RFP up.

So we have said throughout the IRP update, that that RFP, the All-Source, was going to be able to seek to address those years of need. And so the process is working exactly like it should.

A. (Witness Looney) I would say, though, to characterize that we're here trying to figure out how many resources to procure is not the correct way to think about this proceeding. The company has presented a load forecast in the IRP, has presented an updated load forecast in this certification, has presented the results of an RFP, supplemental resources, a very thorough evaluation of all those resources.

So we have a very firm position on what is needed here. We believe we've provided all the adequate information, and we're here to discuss that. I don't -- I think to characterize it that we're sitting up here trying to figure things out is just an inappropriate way to characterize the work that's taken place to date.

Q. You're not saying, though, that the Commission doesn't have the authority to set a goal for these RFPs; is that what you're saying?

A. (Witness Grubb) No, that is not what I'm saying. What I'm saying is the Commission approves us to go conduct the RFP, and we bring forth resources for

certification. To Mr. Looney's point, the company's position is clear, that the full 9990 megawatts is what we're seeking certification for, supported by the load forecast that Mr. Valle's team updated just a few weeks ago. And so it is ultimately absolutely the Commission --

CHAIRMAN SHAW: Mr. Grubb, we are going to stop right here for a brief recess.

MR. GRUBB: Okay.

CHAIRMAN SHAW: So we're going to just hold off. We'll take a five-minute or ten-minute break to give everybody a chance to use the restroom.

(Whereupon a break was taken.)

CHAIRMAN SHAW: All right. We'll pick up where we left off. Thanks for the needed quick break. So, panel, just to remind you, you're still under oath.

MR. GRUBB: Yes, sir.

BY MR. PAWLUK:

Q. As required by the Commission's RFP rules, an independent evaluator was hired to supervise the RFP process that ultimately came out of the Commission's authorizations; correct?

A. (Witness Curylo) Yes. That's right. There was an independent evaluator that was used throughout the RFP process.

Q. Okay. And that was a company named Accion; right?

A. (Witness Curylo) That's correct. Yes.

Q. And among other things, Accion maintained a website for the RFP that included all communications between the company and bidders, including the official RFP solicitation and pro forma contracts?

A. (Witness Curylo) Yes. Once the RFP is serviced, then there is no direct communication between the evaluation team of the company, as well as any -- to any bidders directly. So all communications have to go through the IE website, as you mentioned, yes.

Q. Okay. And just briefly, what is a pro forma agreement? How does that differ from an actual agreement or contract?

A. (Witness Curylo) So the pro forma documents are created ahead of the RFP issuance. And they are so -- they're generated so that the bidding community knows what the standards and requirements are going to be of the RFP, so that they know what they're going to be bidding into.

Q. It's sort of like a standardized contract?

A. (Witness Curylo) Yes.

(The documents referred to were marked for identification as PIA Staff Exhibit 5.)

BY MR. PAWLUK:

Q. I want to show you what I've marked as Exhibit STF-PIA-5, which has been provided to the court reporter. And this is a page from the draft RFP posted on Accion's website on February 26th, 2024; correct?

A. (Witness Grubb) Just one second, Mr. Pawluk.

Q. Sure.

A. (Witness Grubb) So, again, your question was -- you're just noting this is a page from the RFP?

Q. Yes. The draft -- it says draft -- All-Source Capacity RFP, February 26th, comment period, draft.

A. (Witness Curylo) It does, yes.

Q. Okay. And looking at the second paragraph, it says "GPC estimates that up to 8,500 megawatts capacity resources are needed to satisfy GPC's capacity needs." Do y'all see where it says that?

A. (Witness Curylo) Yes.

Q. Again, I think this is what you were referring to earlier, Ms. Curylo. But the purpose of the statement is to announce to the market that the company is seeking 8,500 megawatts of new capacity resources; correct?

A. (Witness Curylo) Up to 8,500 megawatts, yes.

Q. Okay. Even though, or perhaps because, the

Commission had never explicitly authorized the company, or put in any of its orders, that the company was to issue an RFP for 8,500MW of capacity; correct?

A. (Witness Grubb) Could you say that again?

Q. I said, the reason is to announce to the market that there's 8,500 megawatts that's being sought because it had never appeared in any of these prior orders, that the company was going to be authorized to seek 8,500 megawatts; correct?

A. (Witness Grubb) Right. But as I discussed earlier, the megawatts are not set when the RFP is either teed up in the IRP or by the Commission. The Commission ultimately approves these RFP documents that lay out that range. But that 8,500 was based on the needs to meet customers' needs when we calculated those numbers.

Q. As determined by the company; correct?

A. (Witness Grubb) Yeah. As all the capacity needs are, but we share that information with staff, and we -- any of the documents they need to support that.

A. (Witness Looney) And there was an entire 2023 IRP Update that took place just preceding this that would have had updated load forecast, updated capacity needs. So people that were engaged in the regulatory activity in Georgia could have been well versed in what was happening between 2022 and 2023, which would have

given a strong indication of where we were going to end up going with the RFP, as these draft documents indicate.

And, ultimately, the RFP document is approved by the Commission. So that number could have been modified, had it needed to be. The company would have been open, and certainly collaborated with staff and the IE in all of these documents, their development, review, and finalization.

(The documents referred to were marked for identification as PIA Staff Exhibit 6.)

BY MR. PAWLUK:

Q. I want to show you what I've marked as Exhibit STF-PIA-6, which has been provided to the court reporter. You can take a second to look at it. So this is a page from the revised RFP posted on Accion's website three months later, on June 6th, 2024; correct?

A. (Witness Curylo) Yes.

Q. And, again, looking at the second paragraph, there's another statement that the company estimates a need for 8,500 megawatts; correct?

A. (Witness Curylo) Correct.

Q. Now, different from the February draft, though, there's a table that shows estimated capacity needs from the 2023 IRP Update. And I think that's what Mr. Looney just referred to a moment ago; is that correct?

A. (Witness Grubb) Correct.

A. (Witness Curylo) Yes.

Q. All right. So that table showed a capacity need of 2,280 megawatts for winter 2028-'29; 3,247 megawatts for 2029-'30; and 5,960 megawatts for 2030-2031; correct?

A. (Witness Grubb) That's correct. And that would have been the capacity needs in the IRP update. But, again, that up to 8,500 megawatts allows for other shifts in that need that might occur. So, for example, in the '23 IRP Update, I can't recall what were underlying these, but we had not made the decision to extend Gaston and Scherer 3. Even if they were reflected in these numbers, that still was not known.

And so you're looking at trying to make sure the RFP gets you a range to ultimately make the decision to meet your needs. So it would -- it would not have -- it would not have made sense to update it and say, we're only looking for 5,960, because then you wouldn't be able to update that later.

So the 8,500 isn't an up-to, to capture these needs. And this table was put in there to support that there's a high level of needs, and you still had moving pieces in terms of coal retirements in the next IRP and all those types of things.

Q. Where did the -- where did the 8,500 number come from, if not from the 2023 IRP Update load forecast?

A. (Witness Grubb) Well, I would have to go look at the unit assumptions. But, again, it could be the fact that we continued to see load growth updates, so we wanted to make sure that way you had some coverage. And then, again, the unit assumptions could have swayed that as well.

Q. That is a company number, though; right?

A. (Witness Grubb) It is a company number, yes.

(The documents referred to were marked for identification as PIA Staff Exhibit 7.)

BY MR. PAWLUK:

Q. I want to show you what I've marked as Exhibit STF-PIA-7, a copy of which has been provided to the court reporter. Now, this is a report by the Accion Group to PSC dated June 12th, 2024; correct?

A. (Witness Curylo) Yes, that's correct.

Q. We'll look at page 15 of the report. The last bullet page on -- the last bullet point on the page. I'll pull it up too.

A. (Witness Curylo) You said page 15; correct?

Q. Page 15, yes. I'm looking at the last bullet point, where it says, "The process of producing the RFP, four separate PPAs, a contract for APA, and another

contract for BTA, and MTRs for CC and CT projects, was tortuous and unreasonably protracted."

Do y'all see where it says that?

A. (Witness Curylo) Yes.

Q. Okay. Do y'all agree with Accion that the process of producing the RFP solicitation and the pro forma agreements was tortuous and unreasonably protracted?

A. (Witness Curylo) I disagree with that language.

Q. Okay. The IE continues by writing, "GPC knew in July 2022 with the 2022 IRP order that a 2029-2031 All-Source RFP would be conducted and should have had preliminary drafts of the documents available for staff and IE to review within the year rather than the spring of 2024. While discussions about the scope and schedule of the RFP began in the first quarter of 2023, staff and IE first received draft documents to review in March 2024. As noted herein, the draft contracts for BTA and APA were not provided for review until May 2024."

Is the IE's timeline here on the drafting review of documents accurate?

A. (Witness Curylo) He has the correct timeline noted.

Q. Okay. If this RFP had been more targeted at either thermal resources or batteries or other capacity

resources, wouldn't that have shortened the timeline in preparing these documents? So there would have been -- because there would have been fewer documents to prepare?

A. (Witness Grubb) No. Again, first off, we don't target specific numbers of resource types in the RFP. The whole point of the All-Source RFP is to let the market and the company propose submittals in the RFP. So we would not have done a targeted thing. The important thing here is that there was a lot of work on the documents themselves. We were trying to make sure we were backing up from COD dates.

Regardless of this history, we were able to get the RFP developed, sent to the market. We got a very robust response, and we're sitting here in the Commission with results of that RFP to be able to seek certification, serve customers' loads. So we can go through the history, but whether we would have gotten the RFP out sooner rather than later doesn't change the CODs of the resources.

A. (Witness Looney) There also just seems to be a missing part of the narrative here of how many things changed between 2022 and mid-2024, which was the introduction of a tremendous economic development opportunity, an IRP update that took time, effort, resources. There were discussions with the company and Commission staff on other opportunities to run RFPs that

couldn't be agreed upon, and so we followed the 2022 IRP stipulation for an All-Source RFP that staff agreed and stipulated to. We worked with staff, worked with the IE.

So there's just some timing things here that -- as Ms. Curylo said, we don't agree with the language used in the IE report. Although the dates are accurate, the context is a little misapplied in the way things played out, given the nature of things that were happening between 2022 and 2024.

A. (Witness Valle) Yeah. Commissioners, Mr. Looney is bringing a very good point. So towards the end of 2022 is when we started to see all this fast load coming to the state. The speed that we saw was an unprecedented development that triggered the proceeding that presented to you in the 2023 IRP.

So month after month, I remember looking at this portfolio of loads doubling and doubling and doubling. And so it was -- it was a period of fast activity. And so from a forecasting perspective, I wanted to provide that reference for you as well.

Q. So continuing on with that paragraph on page 15, the IE wrote, "The result of this tardiness is evident in the fact that GPC needed to file revised RFP documents. Had GPC been more receptive to working with the IE and staff far earlier, the IE believes the drafting

of acceptable RFP documents would have been completed in an orderly fashion, and the RFP released for bids months ago."

Do y'all see that?

A. (Witness Curylo) Yes.

Q. Do you agree with the IE that the company is responsible for months of delay in releasing the RFP and the RFP documents?

A. (Witness Curylo) So I would disagree that the company is solely responsible for this. Like Mr. Valle represented, and Mr. Looney, there was a tremendous amount going on. And while the IE works very closely with the company on the RFP documents and is integral to our success here, he does not have purview into the loads and what Mr. Valle's group is working on.

And so while he may not have known what was going on in the load forecasting and our growth and in the loads, he only saw the RFP section. And so it is a good cooperative relationship that we have with the IE. We don't always see eye to eye, and that's okay. It's a good constructive relationship. But he's not always privy to everything that's going on within the company.

Q. I mean, did the company deliberately delay the preparation of these IE documents, knowing that load forecast was going to increase?

A. (Witness Grubb) No, we did not. I mean, one of the things we were doing, if I recall, is we were actually trying to also get a lot of similarities between all of our RFP documents. So utility scale, DG, capacity, any of those. There was a lot of work on getting a lot of those things consistent, but there was also a lot of market dynamics. And so there was nothing intentional on the company -- having those documents later than staff and IE may have determined.

The main driver of the RFP was making sure of CODs. And we had, as you read earlier, the targeted timing for filing this certification after the IRP. And we achieved that, and we had 15,000 megawatts bid into the RFP. It was a very robust RFP.

CHAIRMAN SHAW: Mr. Pawluk --

A. (Witness Looney) I would add that --

CHAIRMAN SHAW: Go ahead.

A. (Witness Looney) -- the company was intentional in prioritizing activities during that time period, and what we thought and acted on was a priority to update this Commission on the changes that we saw in the load forecast and address those near-term, immediate needs such that we could enable the economic growth.

Did that require a little bit of delay in the All-Source RFP? Possibly. Again, I, like Ms. Curylo,

don't necessarily agree with Accion's wording that's used. But there was an intentional prioritization of efforts to make sure this Commission was aware of what we were seeing in the load forecasts, and that the company was able to respond to the economic development opportunities that the State had.

CHAIRMAN SHAW: Mr. Pawluk, I hate to do this, but IT is having -- we're having some issues with the livestream on the audio side. Folks -- there's a lot of folks watching online and having some trouble with the audio. So they've asked us to take a 15-minute break and give them a chance to work on it some more. That's what they were trying to work on earlier, and it's still having some issues. So sorry about that, but we're going to take a 15-minute break.

MR. PAWLUK: Thank you, Mr. Chairman.

(Whereupon, a break was taken.)

CHAIRMAN SHAW: All right. I think the audio issues hopefully have been addressed. So thanks for your patience with our technical problems.

Mr. Pawluk, you may continue.

MR. PAWLUK: Thank you, Mr. Chairman.

BY MR. PAWLUK:

Q. So we were talking about the IE report and

the delay that was identified there. To your knowledge, did the cost of labor materials for building capacity, resources, including batteries and combustion turbines, increase between July 2022 and June 2024?

A. (Witness Grubb) Which -- state that again.

Q. Sure. Did the cost of labor and materials for building capacity resources, including batteries and combustion turbines, increase between July 2022 and June 2024?

A. (Witness Grubb) I don't know that we can speak that specifically. I think the important thing, again, to note is the CODs required by the RFP is going to drive what people are bidding in and proposing from a cost standpoint.

Q. But we did observe larger inflation in the market between 2022 and 2024; didn't we?

A. (Witness Grubb) Subject to check. But again, that doesn't mean that -- that the RFP went out in '22, that they're pricing it at that exact time. I mean, the main point of an RFP is when the resources need to be online. And I'm not a developer, but that's what they're going to -- they're going to be aiming towards.

A. (Witness Looney) Yeah, and I think also to add the increase in prices that we observed, and it was well documented in the 2025 RFP, are a function of the

increase in demand across the entire industry. So it's -- you really can't -- it's not a function of time. It's a function of demand. And so that demand materialized, prices increase as a function of supply and demand. That was -- that was not a result of exactly when the RFP documents were or weren't drafted, or when it was or was not issued. It was just a result of the market dynamics.

Q. Well, you knew there was demand back in 2022; right?

A. (Witness Looney) I think we've already discussed here that our perspective on demand in 2022 was quite different than our perspective of demand in 2023, 2024. And our needs for the RFP evolved, and our regulatory process allows for the flexibility to handle that, that changing landscape.

Q. Sure. But if costs went up during that time period, that might have -- and including financing costs as well, due to rising interest rates -- wouldn't the bids have been lower, if we'd gotten the RFP out sooner?

A. (Witness Grubb) I don't think we can speculate on what a developer would do. But again, the key in an RFP is when you're looking to deploy that resource. There was actually some feedback from the market. If you go too early, there's two things. One, people may not bid if they're having to price it out too

far. And then, plus, they may put more risk on it if they're having to price it out that far. So there's always a give and take. But I think the most important thing on a cost standpoint is when those resources need to be available and when they need to be deployed, more than when the RFP was issued.

Q. (Witness Looney) Also, the RFP always contemplated a bid refresh period. That's a feature that was supported by the Commission staff and the IE. And so even if we had rushed the bid -- the RFP out sooner, the market would have called up and it would have materialized in the refresh period, because that was always intended to be later in the RFP process. So you just can't structure an RFP to try and time the market and cheat your way out of the real dynamics of supply and demand.

Q. Has the company conducted any studies or research into whether this delay has caused any cost increases in the bids?

A. (Witness Grubb) No, we haven't. I mean, again, the main point of an RFP is when the resources are going to be deployed. And so we haven't done a study. Because again, the developers aren't required to share what they may have done. And the end of the day is we ran the RFP in an amount of time to file for certification in the second half of 2025 after the IRP, and that is why we

are here.

Q. I mean, costs are going up. Don't you want to get your bids in as soon as possible if you know costs are going up? Is cost not important?

A. (Witness Grubb) If you're bidding it in two years earlier, you may put more adder in there because I've got to wait two more years before I get the reward. So I can't speak from exactly what a developer to do, but I don't think you can just sit here and say, if we'd have run the RFP earlier, we would have gotten different pricing.

Q. I mean, isn't it true, though, that another effect of this delay is the company did have the opportunity to seek more capacity in 2024 than it otherwise would have solicited in the fall of 2022 or the spring of 2023?

A. (Witness Grubb) I disagree. The amount of megawatts that we're requesting through the RFP is based on the load forecast that we filed upon certification. So whether we had run it earlier or not, what could have happened is if we had had it run earlier and we didn't know they were there, we may not have procured as much as we did. But the RFP has always been designed to meet the capacity needs that are present when we file for certification.

Q. Well, we could have filed for certification earlier if the RFP process had been completed earlier; couldn't we?

A. (Witness Grubb) Well, if we had, we may not have had enough resources because the loads have gone up. And so the point of it is we've gotten 99 -- 9,990 megawatts that we've identified to support the load growth that we've seen in the '23 IRP Update, the '25 IRP, and now Mr. Valle's budget '26 load forecast. So that's a -- that's what's at request here, is those resources.

Q. And nearly all of that is going to be company-owned; correct?

A. (Witness Grubb) A fair share of it is, yes. But I don't think you can sit here and -- and I would say that's a good thing. I mean, like, from the prior question about combined cycles, the company bid in combined cycles because we need combined cycles to serve customers.

Q. Going back to the bottom of that page 15 on the Accion Report, Accion concluded, "The ship has sailed for a drafting process of this RFP, but the IE strongly recommends that the Commission direct GPC to engage with staff and the IE in a more timely manner in all future RFPs."

Do you all agree with the conclusion that the

company should engage with the staff and the IE in a more timely manner in RFPs, and perhaps in general?

A. (Witness Curylo) I believe that the company is engaged ongoing with staff and IE in RFPs that are coming up. As we plan, as we look at our loads, as we look at our capacity needs, we are continually engaged with them. And so we have several ongoing RFPs right now that we have worked very closely with staff and IE from the get-go on. So I think we are following this advice and we understand the need for timeliness.

Q. I also wanted to ask some questions about the company's load forecast and some of your testimony, Mr. Valle. And I know we've discussed the forecast before in detail during the 2025 Integrated Resource Plan hearing, so I don't plan on going over the whole methodology in detail.

But just to review, essentially there are two major components to the load forecast: The Organic Load Forecast, which is based on econometric analysis of historical data; and the Load Realization Model, or LRM, which is an upwards adjustment from the organic model based on the probability of exceptionally large load potential customers coming onto the system; correct?

A. (Witness Valle) Yes, that is correct, Commissioners. And so the -- if you think about it, the

engine of what we're doing is the same. The structure and the logic is the same. But we have updated inputs, we have new customer information. And that's what we did between February and now.

Q. And the starting point for the LRM is a pipeline of potential projects, 100 megawatts or larger, that have been proposed to the company in one form or another; is that correct?

A. (Witness Valle) That's correct. There is a threshold of materiality. So for commercial customers, it's 115 megawatts or higher. And for industrials, it's 45 megawatts and higher.

Q. And since the company adopted the basic LRM methodology in the 2023 IRP update, most of those potential projects have been AI data centers; isn't that correct?

A. (Witness Valle) Yes, but the pipeline has been consistently -- the components of the pipeline have been primarily data centers. That has been a steady proportion throughout different updates over time.

A. (Witness Grubb) And so, Mr. Valle, I think Mr. Pawluk specifically said, AI. I don't know if we have a breakdown of what's exactly an AI data center. So data centers, yes. But I think the question was specifically AI data centers?

Q. Yes.

A. (Witness Valle) Yes. So we don't -- we don't make that distinction. So if we're hyperscalers, co-locators, the ultimate use is not something that we -- that we track. But, you know, the needs for the future, the growth is coming from AI. So you would anticipate that the majority should be coming from that use.

Q. On its customer intake forms, though, the company does ask potential large load customers whether their project is AI related, though; doesn't it?

A. (Witness Valle) I'm not aware of all the details, but subject to check, that could be something that we ask.

Q. And the development and adoption of the LRM and its use in the company in forecasting coincides more or less with the explosion of interest and investment in AI and large language models following the release of ChatGPT in November 2022; isn't that correct?

A. (Witness Valle) That is correct, Commissioners. Yes.

Q. Now, the LRM looks at a number of different probability variables to attempt to determine how much of the pipeline's total potential load will actually materialize in the company's systems; correct?

A. (Witness Valle) Yes, that is correct. And

as I said earlier today, Commissioners, the load realization model has tried to estimate the progression of customers through different stages by the use of probabilities. So from stage one to stage two, there is a certain probability for each customer, depending on their particular conditions. And then from stage two to stage three, there is another set of probabilities. And so the combined incorporation of these probabilities give you the odds of success or failure.

Q. At the highest level, the LRM looks at the probability of a project being successful, meaning whether the facility actually gets built and becomes operational, which is modeled as a binary event; correct?

A. (Witness Valle) Yes, that is correct, and that is the result of three customer decisions. The first decision is the selection of a site in the state of Georgia. The next decision is the signature of a contract with the company. And the final is a risk component that we include that tend to -- tend to account for the probability of financial distress or economic downturns for success.

Q. And those three variables that you just mentioned, those are labeled as P-1, P-2, and P-3; correct?

A. (Witness Valle) That is correct.

Q. Okay. And then after looking at the project's success, the model then looks at the probability of the actual metered load matching the announced load; is that right?

A. (Witness Valle) Yes. That metered load is how much of a customer's announced megawatts will show up at the meter. And it's a condition that is measured at full load. So if a customer comes to us, contracts for 100 megawatts, but only 75 megawatts show at the meter, the realization -- the realization for that customer will be 75 percent. It's only one component of all the other components that the load realization model incorporates.

Q. And for that P-1 variable, the state selection, just briefly, how is that calculated?

A. (Witness Valle) So that first probability is -- it's the first decision that a customer makes, about siting their location in the state of Georgia. It marks the transition between a conversation that customers have between the State of Georgia Economic Development Department to the customer choice department at Georgia Power. Once they have identified a site in Georgia, they indicate their readiness to move into the next stages of technical review that would allow us to to get a, you know, a more detailed estimate of their contribution to the total load.

Q. So the state selection is determined based on whether the customer has purchased or has an option to purchase property in the state suitable for the intended project?

A. (Witness Valle) So traditionally, the state selection has been something that the customers have communicated to us. Once they work with the Economic Development Department for the state of Georgia and select a viable site, then Georgia Power has the information to technically evaluate that project.

We don't require any site control proof for industrial customers. We started asking for site control for data centers starting this year, as a result of changes in rules and regulations. We wanted to make it more stringent. And, you know, since the growth -- the majority of the growth in the pipeline is coming from data centers, it was appropriate for us to ask for proof. And so that was implemented this year.

Q. So what is the probability that's given to a project located in Georgia if the -- if the customer owns the property?

A. (Witness Valle) So it's not a probability. It's just a decision. So it's a binary event; right? So if the customer has selected a site in Georgia -- if it's an industrial customer and it has identified a location

that is viable in our state, then that probability is 100 percent. And in the case of data centers, if they show -- they go the extra step; right? And they show us that they have site control via a contract or an option, or a lease, that is proof to us that they have control and we give them 100 percent.

Q. So it's the same whether you own the property or whether you have an option to purchase or there's a lease; is that right?

A. (Witness Valle) Absolutely, yes. And so once the customer -- so like I said before, this was a new requirement for data centers. Before, they didn't have to do that. Now they're giving us more information. They're giving us proof. And so they're giving us more assurance, and so there's no change needed for that -- for that probability.

A. (Witness Grubb) And Commissioners, whether it's owned, an option, or a lease, in an RFP, we do the same thing. We see all of those as a form of control. We do not differentiate theirs either.

Q. But the probability that's assigned if you have any of those is 100 percent for that variable; is that right?

A. (Witness Valle) Could you repeat the question, please?

Q. So I think -- I think I heard you say that the probability that's assigned for that variable for that customer is 100 percent if they show site control?

A. (Witness Valle) Right. Once they show site control, we give them -- we've basically cleared that hurdle; right? And so once they clear the hurdle, then there is no -- there is no question that they're ready to jump into the next stages of the technical evaluation.

And so the option that they use for site control, whether purchasing the land or leasing it or using any other instrument, it's a personal decision. It's a strategic decision, if you would. And the company considers any form of control a valid form of control to clear the hurdle and indicate that they're ready to move into the internal evaluations for the customer.

Q. I mean, assuming we're dealing with a large company with a market capitalization and trillions of dollars, like Amazon or Microsoft, both of which have publicly announced their intention to develop AI products or platforms -- if they were to purchase land in Georgia for 10, 100, $200 million, does that model then assume that the customer has definitively selected Georgia to complete the project?

A. (Witness Valle) So I want to be careful, Commissioners, with the concept. So one, from an LRM

perspective, what we're measuring is the transition from a customer looking at different states; right? And talking with our Economic Development Department, and then getting ready to further explore the project developing in the state. But the decision of the customer locating in the state of Georgia and finally signing a contract and being successful to flow load at the meter is contingent to multiple evaluations.

So this is just the first stage. So I just want to be careful with the characterization that the customer has selected the state, because the, you know, the definition of state selection means something very particular to us, but the overall success of the company depends on the customer signing a contract. And that doesn't happen until they post collateral, until they sign non-disclosure agreements, until they get zoning. There's so many things that they have to be approved for, for the customer to be successful, that we cannot just look at one component and evaluate the overall likelihood of this project.

Q. Okay. But that P-1 variable is called state selection; is it not? That's how it's referred to in your load forecast.

A. (Witness Valle) That is correct. Because it is the selection of a site in the state of Georgia;

correct.

Q. Okay. Now, I want to look at the P-2 variable, as it's described on page 23 of the B-2026 load forecast.

A. (Witness Grubb) Mr. Pawluk, is that the load forecast document -- not the testimony, that's the actual document that we filed?

Q. I think it's part of Mr. Valle's testimony. I think it was an exhibit.

A. (Witness Grubb) Okay. We had filed a document as well, so I just wanted to make sure which we --

A. (Witness Valle) Which page is that?

Q. Page 23.

A. (Witness Valle) Oh, it's probably the technical appendix with the --

Q. The technical appendix. And I want to look at that P-2 variable, which I believe is described in Section 1.5.1.5.

A. (Witness Valle) Okay. Perfect.

Q. "Electric service provider." Now, I think in a previous description of the LRM -- I'm going back to the 2025 IRP. This variable is described as measuring the probability that the customer would choose Georgia Power for electric service, presumably instead of some other

Georgia electric service provider, an EMC or a municipal. Is that a fair statement?

A. (Witness Valle) Yes, that's a fair statement. And that is something that we introduced into the February sensitivity. Because of the progression and the increases that we saw in the data center category, we wanted to provide more certainty to the process. And so before, we were using the likelihood of signing a request for service as an indicator of the likelihood -- of the overall project likelihood to be successful.

But then, because we now have a more formal way to track the progression of customers through internal technical review stages, we decided to make a distinction. And we decided to switch from the likelihood of signing an RFS to the likelihood of signing a contract, which is a more definite state and provides more certainty to the forecast.

As a result of doing this, we are now requiring more hurdles to be cleared to advance from a low likelihood into a medium, into a high. And so if you compare the megawatts that you have in the low likelihood bucket at the beginning of the 2025 IRP versus what we have now in the budget 2026 and the February sensitivity, we now have more megawatts in the low bucket, which means that the forecast is more aggressive. It's more

stringent, and therefore more conservative in the way that associates with the load.

Q. To me, it looks like the P-2 variable is assigned based on how far the customer has progressed through that technical review process, with obviously the highest probability assigned to customers that have actually signed a contract for electric service, or a CES; a slightly lower probability for customers that have submitted an RFS but not yet signed a contract; a lower probability for customers that have completed a timeline review, but have submitted an RFS; somewhat lower probability for customers that have completed a transmission study, but not a timeline review; and an even lower probability for customers that haven't yet completed a transmission study; and the lowest probability for customers that are on hold; is that correct?

A. (Witness Valle) That is correct, yes.

Q. Okay. So, I mean, really, this is -- this P-2 variable is more about how far the customer has progressed through this technical review process, rather than whether they're selecting Georgia Power or some other utility. Is that how this P-2 variable has changed?

A. (Witness Valle) Well, again, it's proof for you, Commissioners, that now, we have something that used to be a somewhat expert-based evaluation into something

that is measurable. So now, we can show you which stages have been cleared, and depending on where we are in those stages being approved, we assign a different level of likelihood. So it's something that we make, from an operational perspective, more of our process, more of our procedure. And it's part of our continuous evolution and continuous improvement; right?

So if we have something that -- right now, we have many things that are based on informed judgment; right? Which is customer information, experience. If we were to be able to start measuring things or converting certain processes into something that we can observe based on facts, and report this one to this Commissioner -- to this Commission, we would do it. And that's what we have done here with P-2.

Q. I mean, does Georgia Power consider itself to be in competition with other Georgia Power providers, including the EMCs and municipals, for these large load customers?

A. (Witness Valle) Absolutely, yes. After the customers have identified a site in the state, they talk to Georgia Power, they talk to the EMCs. They talk to competitors; right? And so we don't know if they're going to be selecting Georgia Power until the moment that they do the formal selection through the -- to a request for --

to an RFS; right?

And ultimately, the contract for electric service is what gives you the full certainty that we will have to serve this customer. It gives Georgia Power the obligation to serve that load at the time when this contract is being signed.

Q. And remind me again, what -- how is it determined whether a project is on hold? Is there a metric for that, or is that a subjective determination by the customer choice department?

A. (Witness Valle) No, it's not a -- it's not a subjective determination. But there is judgment in the process, in the sense that customers are placed on hold when the progress stalled. At any point, we expect customers to show us progression; right? If they selected a site, the next thing they have to do is they need to show us zoning approvals, they need to sign an NDA, they need to give us, you know, the actual affidavit for site control, if it's a data center.

And so if customers don't show us that, then we get a warning sign. And, you know, it's something that triggers a conversation between the company and the customer to see what is happening. If there is no communication in a timely fashion, but we consider that the project's still viable, we put them on hold. There's

a communication to the customer that they have been placed on hold unless they comply with the rules.

The 10 gigawatts that I mentioned in my summation earlier today were customers that we approached proactively, we asked for these new rules and regs requirements; right? We asked for collateral. We asked for all of these things. They were not responding. So the first step was like, "Hey, listen, we're going to put you on hold. And unless you get us the information, we're going to have to take you out of the pipeline."

Then the next conversation was, "Well, I haven't heard from you. And that lack of compliance is going to be the reason why we kick you out of the pipeline." And that's -- that's the process.

CHAIRMAN SHAW: So real quick, excuse me. So you mentioned earlier there was roughly 10 gigawatts that had been removed. Would that have been the reason for some of those removals from the pipeline?

MR. VALLE: Absolutely. Some of them didn't sign an NDA. Some of them didn't provide the affidavit for site control. Some of them were not making progress. They were stuck on zoning approvals. And so --

CHAIRMAN SHAW: What about the 17 gigawatts

you mentioned that had been put on hold, would that --

MR. VALLE: Yeah, those are in sort of the warning category; right? So those are customers that, right now, are not fully compliant. But there is a timing component. It's a quote, unquote, "grace period," if you would, that we give the customers to comply. But that is -- that is something that is evaluated on a case-by-case; right?

Because, just to give you an example, if we have a customer that is a hyperscaler, and they're failing a certain stage of approval and it's a reputable company, we will be willing to, perhaps, give them more time to comply. Whereas, if there is a developer with no experience that is not showing the progress as we expect, we would have, perhaps, not be as flexible.

So there is an evaluation of the project viability done by the company within the process of moving somebody from being active into on hold or being active to just plainly withdraw them from the pipeline.

CHAIRMAN SHAW: Is it fair to say that, at this point in dealing with this, the last couple of

years, y'all developed more of a firm, you know, plan of action and how to deal with this? You know, what prompts them to get held or what prompts them to get removed?

And another question would be kind of based on what Mr. Pawluk had mentioned. He had talked about earlier, about what if -- you know, if the developer or the hyperscaler had already secured land and paid, he started talking amounts and stuff. I mean, I'm assuming -- tell me if I'm wrong, but they would have to have their land already secure before you can even start talking seriously about a contract for service?

MR. VALLE: Yeah, absolutely. They need to have that site control. And that's why we want every data center now talking with the company to have that site control, whether -- whether it's an actual purchase or an option to purchase later. You know, as long as they have a binding agreement that gives them the right to have control later down, that's something that we give them credit for.

MR. GRUBB: And, Mr. Chairman, I think, to your point about improvements and everything -- I'm good, I got this -- the list that we just went

through, in terms of the stages of reviews, exactly of improvement that Mr. Valle and team have made.

And remember, what we're doing here is, all these projects are at different times. We're putting these factors on them so that Mr. Valle can put them in a stochastic model and give us an approximation of the forecast. So if somebody's not quite as far along down the line, then that probabilistic is going to say that load may not show up, much less than somebody who's bought the land, signed the contract.

So each one of them has that measure. And then we run a lot of -- about 100,000 cases to give us a good forecast so we can plan for some growth -- their growth.

CHAIRMAN SHAW: Okay. Thank you.

BY MR. PAWLUK:

Q. Mr. Valle, maybe you can help me out with that, because something there didn't make sense to me. I thought I heard you say that if a customer is a hyperscaler, you would give them more leeway in whether to place them on hold, if there's a delay, than a smaller company. Is that what you said?

A. (Witness Valle) Yeah. But it's basically an example that I was trying to give to Commissioners in the

sense that not every customer is the same. And so the assessment of viability of projects takes into consideration the experience of the customer doing what they're supposed to do; right?

So if you have somebody with a lot of experience building data centers, being in the space, you know, there's a -- there's a different level of certainty. And, you know, our experts evaluate them according to their merits. That was my point.

Q. Well, see, what doesn't sense to me about that is, if a company is a hyperscaler and they're well financed, wouldn't you expect them to progress faster through the pipeline and the technical review process than if they were a developer and they encountered hurdles?

A. (Witness Valle) It could be. But you know, Commissioners, we don't speculate on sight. Not because we have a hyperscaler, we're going to say, "Okay, well, this is a home run," versus a developer, and we will discriminate them against. What we do is we have a framework that is very specific on customers showing us progress through all the review.

So the internal technical review process is the same process for all the customers. So it doesn't matter if we have different types of customers, as long as customers are progressing and giving us what they are

supposed to give us, we will make them progress. We will sign a contract. We will -- it will be a credible counterparty. So it doesn't matter so much -- you know, it matters in the sense that when there is lack of progress, when there is, like, hurdles being encountered, you know, that's where the judgment comes. But in absence of those, the natural progression is what we ask to prove to reflect a load in the load forecast.

Q. I mean, if you've got a hyperscaler that's delaying and not offering a satisfactory explanation for that delay, I mean, doesn't that indicate a probability that that hyperscaler may be shopping around in other states with other projects?

A. (Witness Valle) That's absolutely a probability. That's a case that is possible and is definitely part of the framework. That's why we don't give them a 100 percent probability until they sign a contract. And so it is a possibility.

And that's why, you know, like Mr. Grubb was mentioning, we generate 100,000 different combinations, because that's definitely a case. So we explore everything from complete failure of everybody to complete success and everything in between to inform our forecast. So, yes, the answer for that is yes.

A. (Witness Grubb) Because we do not want to

plan for all of them at 100 percent, and we don't want to plan for none of them picking us; right? So it's somewhere in the middle. And so the process that Mr. Valle and team have done over the last two, two and a half years, has been to capture all of those different risks and progress to, like, the different levels of review, so that we have a very good statistical approach at coming up with that load forecast.

Q. Well, Mr. Valle, you mentioned contracts, and I'm glad you did because that's -- that's the ultimate goal for this technical review process, is a contract for electric service with the customer; correct?

A. (Witness Valle) Well, the ultimate goal for -- is for the load to show up at the meter; right? So, yes, when we have a contract, there is a financial obligation. There is a contractual obligation, right, between the customer and the company to execute and provide a service. We have a small chance that, even after signing a contract, you know, the customer could go into bankruptcy; right? So, although tiny, because we don't deal with companies below investment grade, you know, it's something that is accounted into a load realization model.

And also the materialization; right? So they contract for a certain amount. Do we believe that they're

going to pull every megawatt out of the contract? No, it's going to be something smaller than that.

A. (Witness Grubb) But the ultimate goal being the contract is nothing new. I mean, that's been for decades. I mean, that's who you eventually serve, is they sign a contract and they start building facilities and we serve them and the load shows up at the meter. So that's nothing new. It's a lot more dynamics to it now, but the ultimate goal is still the same. It's always been the case.

Q. So -- but for that -- for the model, for the LRM, the highest probability under that P-2 variable is when a customer has signed a contract; correct?

A. (Witness Valle) Yes, that is correct.

Q. Okay. I wanted to ask some questions and get an idea on where we are for contracts for electric service in the pipeline. On January 28th of this year, the Commission approved the company's request to amend its rules and regulations to authorize contract requirements for minimum contract terms, payment security, and other customer guarantees, in its discretion; is that correct?

A. (Witness Valle) That's correct.

A. (Witness Grubb) For loads over 100 megawatts, that's correct.

Q. Correct. And as part of the order, the

Commission ordered that the company shall exercise the discretion, under the rules and regulations, changes in a manner designed to protect existing customers from bearing any of the costs of adding these large customers; correct?

A. (Witness Grubb) That's correct.

A. (Witness Valle) That's correct.

Q. All right. And just so I understand. I mean, why would customers -- why would existing customers, like some of the folks that we've heard from this morning, like Diedre Johnson or Deborah Moore or Leila Meadows, why would they need protection from bearing the cost of adding these customers?

A. (Witness Grubb) Well, I mean, as this Commission knows, as we went through the '23 IRP Update and we started seeing the investments that were going to be required to serve these large loads, there was a need to add extra protections for those large loads. And so we've said for two years that increasing load puts downward pressure on rates for everyone. And that's the case, because we price them when we sign contracts with them such that the benefits of those customers being out in the system are greater than the cost of adding those customers.

But as the rules and regs in the IRP update, we started seeing these larger loads, we needed an extra

set of protection. And that's what the Commission gave through the Commission ordering the rules and regs. So it is the way to put some more certainty around revenues for those large loads that wasn't there prior to the rules and regs. And that's why it's important to all other customers.

Q. So, I mean, what happens if we don't have that certainty around those -- providing those revenues from those large load customers?

A. (Witness Grubb) Well, the rules and regs gives us much more certainty. That was the point of them.

Q. What happens if we don't have more certainty? That's what I'm asking for.

A. (Witness Grubb) In terms of what?

Q. If we didn't have that certainty, what is the risk of building billions of dollars of infrastructure to serve those customers?

A. (Witness Grubb) Well, I mean, the risk would be that other customers pay for that. However, when you look at the amount of commitments that Mr. Valle had in his exhibit, and the rules and regs are clear that it says they will -- the cost recovery will be designed in a method, designed in a manner in which existing customers don't pay for large loads. So these contracts are to do that, and so that will govern everything we do on cost

recovery.

This filing is not about cost recovery. But if some of those actions happen, it would be a cost recovery discussion. But again, we've got 4.6 under contract. We've got two under the rules and regs contracts. We've got several more that we expect in the next few months. And so that -- the risk is that they don't show up, but that's exactly why the rules and regs were amended.

(The documents referred to were marked for identification as PIA Staff Exhibit 8.)

BY MR. PAWLUK:

Q. I want to show you what I've marked as Exhibit STF-PIA-8.

MR. PAWLUK: Mr. Chairman, if Mr. Dix. could approach?

CHAIRMAN SHAW: Sure.

BY MR. PAWLUK:

Q. So this was the Commission's order from April 17th. And I want to look at the second page under subheading II, "findings of fact." The first paragraph there.

A. (Witness Grubb) Page two. Again, which section?

Q. Subheading II, "findings of fact."

A. (Witness Grubb) Okay.

Q. First paragraph. Commission wrote, "Under the draft terms and conditions, customers would pay the higher of tariffed rates or a minimum bill amount each billing period they are a customer."

Do you all see that?

A. (Witness Grubb) Yes.

Q. Okay.

A. (Witness Looney) Yes.

Q. Now, what is a minimum bill? And how is that different from the tariffed rate amount?

A. (Witness Grubb) So no one on this panel is involved in designing the cost recovery of the rules and regs contracts. My understanding is that our team that has done those has met with staff on it, and so I think that question is better handled there.

We can't speak to exactly what is meant by tariffed rates or minimum bill, other than the minimum bill has a -- has the ability to project revenues regardless of the usage if the load doesn't show up. But I don't think anybody on this panel can speak through all the details of what those are.

Q. Okay. But we're talking about the load forecast, and part of the load forecast, as y'all have testified, is whether there's a contract. And contracts

can have different terms; is that right?

A. (Witness Grubb) Correct. But the rules and regs contracts are what we're speaking through. You're asking for very specifics --

Q. Okay. Well, that's what I'm asking about.

A. (Witness Grubb) You're asking for very specifics on how the minimum amount and the costing is handled on those contracts.

Q. I mean, it doesn't -- I don't think it's that specific. I'm just trying -- I'm just asking what's a minimum bill versus the tariff rates, as the Commission found in its findings of fact.

A. (Witness Valle) At a high level, Commissioners, like -- I agree with Mr. Grubb, we're not experts and we're not in that area to know exactly how it gets calculated. But at a high level, minimum bill is about cost recovery. Minimum bill is the established amount in the contract that gives you an amount that would ensure that the cost incurred by these customers on the system will be recovered.

Now, the specifics about how it gets calculated, all that, I'm not aware of all the details, but that -- that's overall the concept. And that's something that has governed the pricing and the offers of contracts always. So always, we have conducted economic

evaluations to ensure that the load that these customers are bringing passes what is called the rate impact measure, the RIM test, which means that they're bringing revenues above their incremental cost to being served.

And so the guarantees and the principles behind the contracts have always been there. What happens now is that, with the implementation of rules and regs, we have additional protections, and minimum bill is one of them that is going to cover for performance in a more extreme set of conditions.

Q. So it's a form of guarantee; is that correct?

A. (Witness Grubb) I don't know the legal ramifications of calling something a form of guarantee. To Mr. Valle's point, and reading this, tariffed rates is going to be whatever rate the customer's on, whatever usage is in that month, they're going to pay that. Or if it's not enough to cover the cost, there's a minimum bill set in there. I don't know -- when you say "a form of guarantee," it's a minimum amount of revenue, per the contract, that the company would recover from that customer.

Q. So in addition to protecting ratepayers, I would assume that having minimum billing provisions would also provide incentives to large load customers to actually use electricity under the tariffed rates, up to

the amount of the minimum bill, and increase the likelihood of that load materializing, as forecasted in the LRM; correct?

A. (Witness Valle) So again, Commissioners, the purpose of the minimum bill is not to incentivize usage. It's to ensure that we have cost recovery. Now, I can see the angle where, if you're paying for something, you may as well use it, and that -- but that's not the purpose of the minimum bill. The minimum bill is not to make or to enforce usage on customers, it's to ensure recovery. Because when we do that, we protect our existing customers from any cost -- increase in cost by these data centers.

A. (Witness Grubb) Yeah. The customer's incentive is going to be to conduct their business and have usage to do that. To Mr. Valle's point, it's if, for some reason, they're not to the level that we need from a revenue standpoint, then the minimum bill would kick in.

Q. If the contracts didn't include the minimum billing guarantees over the term of the contract, that would -- that would presumably decrease the probability of the load materializing as forecasted under the model, though; right?

A. (Witness Grubb) I mean --

MS. PRYOR: Objection. This assumes facts that are not in evidence. These witnesses have not

testified to the contents of the large load contracts, and this is not a cost recovery proceeding.

CHAIRMAN SHAW: If you want to try to reword it to where it's focused on load forecasts and so forth, or else just move on.

MR. PAWLUK: I did refer to the load forecast, Mr. Chairman, and that's -- that's how I phrased it. I'm not sure what the objection is.

CHAIRMAN SHAW: Well, Panel, can answer the portions of what he's asked that are referenced to the forecasting?

MR. GRUBB: So state your question again in terms of the load --

MR. VALLE: Can you, please?

MR. GRUBB: I think what you may have been asking was, do we treat the load forecast risk or probability differently if there was or was not a minimum bill?

BY MR. PAWLUK:

Q. Well, the highest probability under that P-2 variable is contract for electric service; correct?

A. (Witness Grubb) That's correct.

A. (Witness Valle) That is correct.

Q. And if the contract were to include minimum

bills, that would increase the probability of the customer using that electricity; correct?

A. (Witness Valle) That's not the way it works in the load realization model. So what we do is, once the customer has signed a contract, we know what is our contractual obligation to deliver; right? Then there is an assessment of materialization. Because for every megawatt out there, we know that only a portion of that is going to show at the meter. So that portion is what we plan to serve. And so the forecast is developed with that. The forecast is developed assuming that we have to serve the customer needs according to the contract, derated for materializations, you know, that are reasonable to incorporate.

A. (Witness Grubb) And so, Commissioners, as we've talked through -- so that means that they've selected the state, they've selected Georgia Power, and they've gone through everything they need to do to contract it. So the likelihood of that load showing up is as great as it can be. And whether it's the minimum bill or not, we still reflect that for any contract served, whether it's rules and regs or not; right? So when you sign a contract, that customer has done everything they need to do for us to have the obligation to serve them. And that's why it's got the highest level of certainty in

the forecast.

Q. Well, you know, maybe this helps out. If we go to the second sentence of that, that findings of fact in the order, where there's a more detailed description of the minimum bill. It says, "If the customer ended the contract early, the customer would be liable for the minimum bill amounts, not the tariffed rate amounts, for each period for the remaining term of the contract."

Do y'all see that?

A. (Witness Grubb) Yes.

MS. PRYOR: Objection. This is still a cost recovery question. Even if the customer doesn't use anything, the minimum bill is still to be recovered. This is also questioning the witnesses from an order that is not subject to this docket.

CHAIRMAN SHAW: I agree. Let's stick to the certification docket and -- or try to --

Mr. Pawluk, try to reword that so that it does pertain. And, Panel, if it's not something you can answer, just --

MR. GRUBB: Yes, sir.

CHAIRMAN SHAW: -- let us know. I mean, if it's --

MR. LOONEY: We will.

CHAIRMAN SHAW: Let's move on.

(The documents referred to were marked for identification as PIA Staff Exhibit 9.)

BY MR. PAWLUK:

Q. Sure. Let me show you what's been marked as Exhibit STF-PIA-9. So this is a press release for the company titled, "Georgia Power highlights first contracts under new rules and regulations, continued economic growth and updated forecasts in latest filings with Georgia PSC."

If y'all wanted to take a minute to look it over.

A. (Witness Grubb) Yeah, the whole -- it's two pages, so --

Q. Sure.

A. (Witness Grubb) -- it may take us a second, but...

I went to Georgia Tech. I read a little slow. Can do math, but reading takes me a minute.

Q. My son's the same way, but that's fine.

All right. Georgia Power has -- I'm looking at the first paragraph of the press release, where it says, "Georgia Power has filed nearly 2 gigawatts of new customer contracts with the Georgia Public Service Commission, marking a major milestone for the state's energy landscape. These agreements are the first to be reached under Georgia PSC's newly approved rules and

regulations, which were designed to provide Georgia Power with flexibility to sustainably serve large load customers while safeguarding residential and small business customers from additional costs."

Do y'all see that?

A. (Witness Grubb) Yes, sir.

A. (Witness Valle) Yes.

Q. Okay. Now, first of all, congratulations on reaching that milestone. I did want to ask some questions about those contracts. And I know you've said that you're not familiar with all the details of the contracts, but this is a public press release, and I figured you might know something about it. And there's not a lot of detail in this press release. I mean, how many contracts is it that have been filed here?

A. (Witness Valle) So my understanding is that's three, subject to check.

Q. Okay. And have those contracts now been executed; do you know?

A. (Witness Grubb) Well, I believe two have been approved by staff, I think one is -- the timeline is this week. I don't know what the execution status is. I'm not sure if the process is approved then executed, or executed then approved before it takes effect. I'm not sure.

Q. Now, my understanding of the Commission's order is that staff has the right to object. Are you also saying that staff has the authority to approve these contracts?

A. (Witness Grubb) Well, there was a letter saying they agreed that it was -- it met the requirements of the rules and regs.

Q. Was that for all --

A. (Witness Grubb) I don't remember exactly what the legal term is.

Q. Was that for all three contracts, or was that just for some of them?

A. (Witness Grubb) Say that again. I'm sorry.

Q. Was that for all three contracts, that the letter applied to, or is that for just some of them?

A. (Witness Grubb) I believe that was --

MS. PRYOR: Objection. The order speaks for itself.

MR. PAWLUK: I mean, I was just asking him, Mr. Chairman.

MR. GRUBB: Mr. Chairman, we are not involved in all the details of the rules and regs contracts and what the calculations are and all the provisions. What we are saying is, from a load forecast and a resource certification process,

having those contracts executed under the rules and regs gives us much more certainty on cost recovery and load forecasts, which was indeed the point of those rules and reg efforts.

So when Mr. Pawluk's asking about all the details, we have an entire group dedicated to that. They've had discussions with staff, and that process is in place under the Commission's rules and regs. What we're saying here is, from a load forecast standpoint, Mr. Valle's talked about how it's factored in, and the other questions we get around cost recovery of these resources, as you have these rules and regs contracts executed and approved, etc, whatever term you want to use, there's more certainty that revenue is coming in. So that's what we're speaking to.

CHAIRMAN SHAW: All right, Mr. Pawluk, just -- let's try to keep the questions, if you can, to this panel's expertise level, in terms of what they were involved with in terms of these contracts, if you can. Because I know staff's been more involved in a lot of these contract discussions than some of the folks on this panel, but...

MR. PAWLUK: I do believe it is relevant to

this discussion of whether this load is going to materialize, Mr. Chairman, to -- the precise terms of some of these contracts and the protections that are in there. So, I mean, I do disagree that it's not relevant to these proceedings.

I understand the panel's expertise may be a little bit limited, but I would like them to answer, to the best of their knowledge.

CHAIRMAN SHAW: I don't object to that. I mean, if you can -- if there's something else you can answer --

MR. GRUBB: Well, yeah, ask the question --

CHAIRMAN SHAW: -- based on your knowledge level.

MR. GRUBB: Yeah. So I think, Commissioner, what I was laying out is, we're able to answer from the standpoint of how it impacts their certification. What we don't know is the details of those discussions on contracts and those types of things. What we're speaking to is the higher level of certainty that Mr. Valle gives it in his model.

And then on the standpoint of you're asking -- and we're asking this Commission for these resources, the more contracts you have, the

whole point of rules and regs was to get more certainty around those revenues to pay for them. So that's what we can speak to, the details of the process and the order and the requirements and all that stuff, we just -- there's another group that handles that.

BY MR. PAWLUK:

Q. Well, let me ask you this, Mr. Valle. In the model, there's a probability that's assigned when the customer has a contract for electric service; correct?

A. (Witness Valle) Yes, that is correct.

Q. Okay. Now, some of those contracts came into being before the rules and regs changes; is that correct?

A. (Witness Valle) Yes, that is correct.

Q. Okay. And the rules and regs changes did something. They increased -- they did something; correct?

A. (Witness Valle) It did -- yes, it did provide protection to existing customers, yes.

Q. All right. You're just not sure what the details of those protections are; is that what you're saying?

A. (Witness Grubb) No. And we've spoken to the minimum bills is one area of more protection, the longer termed contracts, financial security, and those types of things. The contract for electric service, that's for

anybody under 100 megawatts that we've used for decades and continue to use, has protections for customers. The rules and regs added protections above that for loads over 100 megawatts. And so those four areas that are in the order about what we can do under rules and regs for loads that are over 100 megawatts is an extra level of protection.

MR. PAWLUK: Okay. You see, Mr. Chairman, this is where I have an issue here. I mean, he says on the one hand, he's familiar with the minimum billing requirements but on the other hand, he's not.

MR. GRUBB: I'm familiar with that we have minimum billing requirements. I can't speak to how they're done in the contract and the math behind them.

MR. VALLE: And from a load forecasting perspective, Commissioners, a contract is a contract. It's an obligation, regardless if it has more or less clauses; right? So now the new contracts have more protections to existing customers, but it is a binding obligation for the company to deliver.

And so whether, you know, whether there is a link between those clauses into the actual load

forecast, that's, to me, is, like, something that I -- I don't see the connection. It's -- you know, there is a legality, there is a certainty. So from a forecasting perspective, I care about the certainty of the load that I have to serve. And a customer that is prospective, that is going through the technical review process, versus a customer that has a contract -- a customer with a contract is more certain. That's -- that's what I consider within my framework. That's all it is.

MR. GRUBB: So if it's a 50-megawatt data center that signs a contract that doesn't have the new rules and regs added to it, we're still obligated to serve it, and it goes in the forecast with as much certainty as a 500-megawatt resource with the contracts. The rules and regs is much more around that cost recovery certainty. But from a forecast standpoint, to Mr. Valle's point, any customer that signs a contract -- they've picked the state, they've picked Georgia Power, they've signed the contract, we are going to plan to meet those loads.

BY MR. PAWLUK:

Q. Well, you know, let's say I'm a commercial lessee and I want to enter into a business lease, you

know. If I negotiate with the landlord and enter into a lease with a termination provision where I can walk out on the lease after two years as opposed to a lease commitment for ten years, does that not make it less probable that I'm still going to be around in ten years?

Do you see what I'm saying?

A. (Witness Grubb) I didn't follow how that applies to rules and regs.

Q. Well, there's a difference in contract terms. They're not the same contracts; right? If you have a two-year lease versus a ten-year lease.

A. (Witness Grubb) Right. But, again, the rules and regs are adding those extra -- the contract aspects to it. The existing contracts still have protections. So from a load forecast standpoint, we're assuming that those customers that sign contracts, we are going to plan to serve them. We're not planning on them terminating or canceling or any of that. They have signed a contract, we have an obligation to serve, we're going to include them.

A. (Witness Valle) These contracts are signed for 10 to 15 years, Commissioners, so it's not -- it's not something that is signed for the next two years. This is, like, longer term. So it is a long-term contract. So it's not something that is going to be terminated.

CHAIRMAN SHAW: Doesn't the minimum bill -- excuse me, I know it's not your expertise level, but doesn't the minimum bill provisions take into account all the studies that have been done over the length of the negotiations, in terms of what it's going to take to provide the generation, distribution, transmission, everything, based on all those cost studies?

MR. VALLE: Yes.

MR. GRUBB: That is our understanding. We understand that is done. What we're saying is we can't speak to all the details of how that's done, but it is done.

CHAIRMAN SHAW: I gotcha.

MR. GRUBB: But it is done, that's correct.

MR. VALLE: It's meant to cover -- so if a data center is coming to our state, it signs a contract with us. We are going to make sure, with these minimum bill requirements, that the cost to serve this load, the incremental cost to serve this load are paid by this customer and they're not passed. We're protecting existing customers. And that's the purpose of the minimum bill.

BY MR. PAWLUK:

Q. Okay. But only 1.9 gigawatts of that

contracted service has those minimum bill provisions, is that correct, as it says in the press release?

A. (Witness Grubb) Yeah, but the other commitments are still under contract.

Q. So they have the same level of protection as these 1.9 gigawatts?

A. (Witness Grubb) The rules and regs was clearly to add a higher level of protection. All the other contracts have protections. It was a higher level --

Q. But they have lesser protections.

A. (Witness Valle) Yeah, more than half of this 4.6 gigawatts of existing -- before rules and regs, more than half of the megawatts have what is called a MAC rate, a monthly access charge rate, that is paid by the customer regardless of the consumption. So there are protections. It's just that rules and regs provided with additional protection; right? When the growth started to pick up, when we needed to start making investments, we added those. It was the prudent thing to do.

A. (Witness Grubb) And the contracts for electric service that are below 100 megawatts are the same contracts that we have had in place for decades that have allowed this state to grow and be the best place to do business for 11 or 12 years. We plan on it, and we

forecast it.

CHAIRMAN SHAW: Isn't it true that we were, if not the first state to adopt these type -- new, much more strict regulations on large load customers --

MR. GRUBB: I believe that's our understanding, yeah.

CHAIRMAN SHAW: -- or if not the first, we're one of the first?

MR. GRUBB: That's correct.

MR. VALLE: Yeah.

CHAIRMAN SHAW: We think we were -- we probably acted, logically, as fast as you possibly could when all this was taking place?

MR. GRUBB: Right.

CHAIRMAN SHAW: But at the same time, I think Mr. Pawluk is asking the question of is there a difference between the contracts that were done prior to the new regulations and those? And, I mean, I think you've answered that.

MR. GRUBB: There's a difference on the rules and regs having a higher level of protection, but there's no difference in terms of how we are obligated to serve those customers and how we put them into our plans and serve them. Because if

you're at below 100 megawatts today, you're going to sign the same contract somebody signed two years ago, six years ago. There are protections there that has allowed us to plan for this load growth. Rules and regs was an extra level of protection.

CHAIRMAN SHAW: All right. Let's move on.

BY MR. PAWLUK:

Q. Skipping -- I want to go back to the press release for a couple more questions here. Skipping down to the third paragraph, which says, "Georgia Power remains in active negotiations with multiple large load customers representing several additional gigawatts of potential demand."

Do you see that?

A. (Witness Grubb) Yes.

A. (Witness Valle) Yes.

Q. How much is several additional gigawatts of potential demand? Is that three? More than three? Less than three?

A. (Witness Grubb) We don't know. Again, there's another group handling that. And I'm not sure we would share what's potential out there in terms of megawatts, anyway, trade secret-wise. But we know there's several, but we do not know the megawatts.

Q. All right. Looking at the next paragraph,

second sentence, where it says, "Combined with continued progress on new customer contracts, this outlook further supports the company's request to certify approximately 9,900 megawatts of new capacity resources through the All-Source RFP."

How does two gigawatts of contracts and several additional gigawatts of potential demand get you to nearly 10 gigawatts of new capacity resources? Help me out there.

A. (Witness Grubb) So this talks about demand. So the 10,000 megawatts, 2,000 of that is for PPA expirations, like I mentioned in my summary. The demand is what we're looking at here, is the 8,500. The 9,900 covers load growth, reserve margin, and PPA expirations. The point of this press release is, as we've gone through the last two years, Commissioners, with bringing the '23 IRP Update, seeing the increased load forecast, all those types of things, we've continued to put more and more certainty around that load forecast. And these contracts do exactly that.

So the point of this is, that as we continue to get questions in these proceedings around, how do we know the load is going to be there? Every one of these steps is more certainty that that load is there and these resources are supported.

Q. Going back to the P-2 variable. Some of these questions have been answered, I'm just trying to find my space here. Well, let's assume, hypothetically, what would happen to -- if this P-2 variable had only two potential probabilities, let's say, 100 percent probability for customers that have signed a contract for electric service, and a 0 percent probability for customers that have not signed a contract for electric service? Simple binary choice.

Do y'all understand my hypothetical there?

A. (Witness Valle) Yes. And that hypothetical scenario, Commissioners, will be really dangerous, because we would not be planning for growth. We would be only considering customers with a contract, and we would jeopardize reliability. We would close the doors of the state, and Georgia would not be a top state for doing business anymore.

We have always planned for growth, you know, for residential, commercial, industrial customers. This is no different. And so if we were to do that technical trick of assigning zero probability for anything without a contract, then technically, you are excluding everything that doesn't have a contract from the load.

A. (Witness Grubb) That's right.

Q. There was a meeting and a hearing held by the

Georgia House of Representatives Special Committee on Resource Management, Subcommittee on Energy, on September 4th to discuss the state's electricity needs. I believe Aaron Mitchell attended and gave a presentation on behalf of Georgia Power.

Do y'all remember that?

A. (Witness Grubb) I was not part of the presentation, or was not at that meeting.

Q. Okay. There was also a representative from Georgia EMC, Jeremy Nelms from Flint Energies, who took some time to discuss the EMC's approach to long-term planning, and the EMC's official load forecast, which gets submitted to the federal government. I don't know if any of y'all managed to catch any part of his presentation.

A. (Witness Grubb) Did not.

A. (Witness Valle) No, I did not.

Q. During his discussion of the EMC's official load forecast, Mr. Nelms asserted that their forecasting does not include, quote, "speculative large power loads," which he described in the presentation slides as loads not under contract.

Were y'all aware of that?

A. (Witness Grubb) Was not.

A. (Witness Valle) Not aware.

Q. Obviously not including large loads, not

under contract in their forecast, is a significant departure from Georgia Power in its forecasting the LRM model; correct?

A. (Witness Grubb) Based on that face value of what their comment was. But I think the important thing here is, Commissioners, as Mr. Valle said, if you step back all the way to the '23 IRP Update and what we've been able to do to enable growth and get all this interest in customers is because we project it.

As Mr. Valle said, residential, commercial, industrial, every forecast has projected load growth in it that's not contracted and committed, but we have -- the vast majority of the load growth that we're asking for is under contract or has a commitment through an RFS, as Mr. Valle's exhibit showed.

So I can't speak to why the EMCs would do that. I think from our standpoint, by being able to plan for this large load growth and, in parallel, planning for it, knowing the cost of it and being able to execute those contracts, the process is working exactly like it should. That's what has enabled us to have this type of growth that will put downward pressure on rates for everybody.

A. (Witness Valle) Yeah. Our plan, Commissioners, keeps the lights on with reliability; right? Keeps rates affordable, because these customers

bring more megawatts to spread out costs. It's good for existing customers and keeps Georgia the nation's number one state for doing business.

So what other companies or other regions are doing is based on their needs. We are presenting you with something that supports the growth of our state and is the best alternative for our existing customers.

Q. So you don't think it's prudent, then, for Georgia EMC and Oglethorpe to exclude those uncontracted large loads from their forecasts?

A. (Witness Valle) I cannot answer for them. I mean, they have to do what is right according to their planning process. And so it could be related to size, you know. It could be related to multiple factors. So I'm not familiar with the strategic views of that particular presentation, so -- but I can only talk about what Georgia is trying to do -- Georgia Power.

A. (Witness Grubb) We also don't know the nature of that contract. We don't know anything other than that statement that you just mentioned.

Q. Okay. Has Georgia Power had any conversations with Oglethorpe or EMC about how they do their forecasting to try to gain some insights or wisdom from fellow Georgia companies?

A. (Witness Valle) Personally, no, I have not.

I've been in conversations with other utilities across the nation. I've been reading literature, reviewing things. And so I'm generally aware of what is happening across the nation, but nothing specific with the EMCs.

Q. Now, under the LRM, if the model determines that a project is successful or likely to be completed, the model then forecasts the probability that that metered load -- or the actual load that materializes will match the customer's announced or intended load; is that correct?

A. (Witness Valle) No. It's going to be lower than the announced load by the materialization percentage.

Q. I'm looking here at page 25 of the B-2026 load energy forecast.

A. (Witness Grubb) Page 25, you said?

Q. 25, yes.

A. (Witness Grubb) Okay.

Q. The technical appendix.

A. (Witness Valle) Okay.

Q. There are different load materialization probability assumptions that are assigned to particular projects based on the nature of the potential customer's business, including whether the customer is a data center hyperscaler, co-locator, developer with data center experience, or developer without data center experience;

correct?

A. (Witness Valle) That is correct. That's one of the differentiations that we included in the February sensitivity, to make a more stringent set of assumptions for data center developers and co-locators with no tenants, to reflect the expected occupancy rates versus hyperscalers.

Q. And I know we discussed this during the company's rebuttal testimony in the 2025 IRP, but I just wanted to make sure, a hyperscaler means a large, well-capitalized company with an established customer base capable of scaling up its products and services for a worldwide customer base very quickly; correct?

A. (Witness Valle) I think they're well-capitalized customers across the spectrum. So, I mean...

Q. Well-capitalized, is that the main criteria for being a hyperscaler?

A. (Witness Valle) No, it's about the business and having the final use for --

Q. So have a product that you actually use it for?

A. (Witness Valle) Right, right.

Q. And a developer, I guess, would be a smaller, private business that's more reliant on outside investors

for capital with some experience in real estate development projects, but not necessarily experienced in building data centers, and also without its own products or an established customer base. Is that a good way of describing it?

A. (Witness Grubb) So, Mr. Pawluk, you referenced the 2025 IRP rebuttal testimony. Are you reading that from our testimony or are you --

Q. That's just how I'm characterizing it --

A. (Witness Grubb) Okay.

Q. -- based on what I remember from the 2025.

A. (Witness Grubb) I was just making sure, if you were referencing specific documents.

Q. I'm not.

A. (Witness Grubb) Okay.

Q. That's just how, in my mind, I think of developers.

A. (Witness Grubb) I just wanted to make sure. Thank you.

Q. If y'all disagree, you can correct me.

A. (Witness Looney) I don't think a developer is necessarily small or inexperienced or not well-capitalized. They don't have the direct computational need that the hyperscaler has. And so it doesn't mean they're not a legitimate enterprise that can

be trusted to execute on their business model. It's just their business model is developing the data centers for other people that have a direct computational need to participate in.

Q. Well, let me show you a couple examples of what I think are developers, and maybe that'll help you out.

MR. PAWLUK: Mr. Chairman, if Mr. Dix could approach.

CHAIRMAN SHAW: Go ahead.

BY MR. PAWLUK:

Q. And this is a trade secret document, so it has not been provided to the court reporter, and I'm not going to request that it be entered into the record.

So without going into the specifics of the document, this is a data center project intake form submitted to the company by a potential customer towards the beginning of this year; correct?

A. (Witness Valle) Yes. So this is a new document that is needed for every customer to join the large load pipeline. And so, yes, it has -- how many -- it has, like, almost 100 questions -- 111 questions that needed to be provided.

Q. Okay. And are you aware that the potential customer shown on this form has a website which identifies

the customer as a property company and lists a portfolio of projects in operation or in planning construction phases, all of which are either warehouses, distribution centers, office parks, or truck parking?

A. (Witness Grubb) I was not aware of that.

A. (Witness Valle) No. Is that in any of the questions of this document?

Q. It isn't. It's --

A. (Witness Valle) Sorry?

Q. -- it's a website.

A. (Witness Looney) I don't think any of us have reviewed that website.

A. (Witness Grubb) Right.

MS. PRYOR: Objection. He's introducing evidence that the witnesses haven't seen, and he's not laid the foundation to be asking questions about something they haven't seen.

CHAIRMAN SHAW: Yeah. Sustained.

BY MR. PAWLUK:

Q. Are you aware if this customer has any experience building data centers?

A. (Witness Valle) So I don't know what this particular customer is -- well, project name --

A. (Witness Grubb) We also haven't read the full document, so...

A. (Witness Curylo) Can you point us to a number -- a question number that has that information?

A. (Witness Grubb) Is there somewhere in here?

Q. I'm just asking if you know. I mean, it's one of the customers in the pipeline.

A. (Witness Valle) Not at the top of my mind, but I'm sure if we were to talk with the experts in our customer choice department, the project managers will know all the details about this.

Q. Okay. But to be clear, this company and its project is included in the company's large load forecasting pipeline; is that correct?

A. (Witness Valle) I would have to look at the pipeline, but yes, I would -- subject to check.

Q. Going back to those categories, the developer, hyperscaler. I'm a little bit less clear about what a co-locator is. I assume that means a company like Flex Central or QTS -- Flex Central having sent some representatives here this morning -- and I think they identified themselves as a co-locator that has experience in building data centers and a network of potential tenants that could be contracted to utilize the computing power of the data center once it's operational.

Is that a good way of describing a co-locator?

A. (Witness Valle) Yeah, yeah.

Q. Now, going back to my previous question, why does the LRM distinguish between hyperscalers, co-locators, with or without tenants, and developers, with or without data center experience, when it comes to load materialization from successful large load projects?

A. (Witness Valle) Because it's the appropriate thing to do, Commissioners. So if you have -- so a simpler way to explain what a co-locator is, is that it's a company that builds the facility. Some of them even have the computers in their facilities. And they sign -- they provide the service to companies that need those services; right?

If a co-locator comes with a specific megawatt ask and they don't have committed tenants for their facilities, well, there is uncertainty of how much of that load are they going to fill up. That's where we are lowering the materialization; right? Same thing for developers, you know. These are viable companies. They are in the business of building data centers, but they don't have the ultimate user; right? And so it is appropriate to discount it. Now, typically, developers sign contracts, and they convert into hyperscalers.

There is an evolution; right? And so the customers are represented with the information that we

have in front of us and risk-adjusted accordingly to their merits. And so the differentiation that we're talking about here is really to account for that occupancy; right? And so when we saw -- in February of this year, when we saw that the pipeline went from 25,000 megawatts to over 48, or so, the majority of that increase was coming from developers and co-locators with no tenants. And so based on that shift in the marketplace, we deemed appropriate to penalize them because, you know, the supply and the demand was going a little bit faster than traditionally -- what traditionally has been.

Q. Now, something that really strikes me as not making any sense, and maybe you can help me out here is: Doesn't the nature of the customer, whether it's a hyperscaler like Microsoft or Google or a developer, with or without data center experience, impact the likelihood of the project being successful, in addition to whether the metered load ramps up to the announced load?

A. (Witness Valle) It absolutely does. So if a customer comes with no experience and they want to get through the process and they don't provide us with proof that they have the experience, we're not going to let them get the transmission studies approved. We're going to reflect it into this P-2 probability.

Q. Okay. But that's not reflected in the P-2

probability; right? I mean, if --

A. (Witness Valle) It is implicitly.

Q. Implicitly?

A. (Witness Valle) I mean, yes, because it's -- you know, the P-2 probability measures progress through stages of technical review; right?

Q. Okay. But a Microsoft and a developer could be at the same stage of technical review; couldn't they?

A. (Witness Valle) Yes, based on their merits, right.

Q. All right. And they would be treated the same under -- whether the project is successful?

A. (Witness Valle) Absolutely. If they have --

Q. Even though one has lots of money and experience and a product, and the other does not; correct?

A. (Witness Valle) But that is a different risk. The fact that some company may be better capitalized than other, it's a financial risk. And so that is evaluated with a different probability, that P-3 measures that. And we have based our assessment on the default rate for investment-grade companies. And we have made that assumption a little bit more conservative than what rating agencies have provided us with. So yeah, I would disagree with the statement because the capitalization, it's -- and experience may not be related.

Q. So you're saying the P-3 variable captures that difference? Is that what you're saying?

A. (Witness Valle) The P-3 captures the risk of economic distress, financial downturns, and it's a single number that is applicable to the whole industry.

Q. Okay. What's that threshold in the P-3 variable?

A. (Witness Valle) The number is trade secret, but -- so when you say "threshold" --

Q. What's the minimum credit rating for a company to qualify under that P-3?

A. (Witness Valle) Subject to check, I believe it's triple B minus. Subject to check.

Q. Okay. So that that triple B minus, that could still include some developers as well as the hyperscalers; is that correct?

A. (Witness Valle) I don't know the composition of the -- I know that we ask a minimum set of financial health for us to do business with. Part of the intake form, part of the onboarding is they need to provide financial information.

Q. Now, the B-2026 load forecast was prepared based on data from the company's large load pipeline at the end of Q2 2025; isn't that correct?

A. (Witness Valle) It was actually taken the

pipeline as of Q2, but we made some adjustments on the way to mid August of this year. But it was the pipeline as of Q2, with tweaks and information available as of middle of August.

Q. Okay. I want to show you the list of projects in the large load pipeline, as provided as part of the company's Q2 2025 large load report.

MR. PAWLUK: Mr. Chairman, if Mr. Dix could pass that down.

CHAIRMAN SHAW: Go ahead.

BY MR. PAWLUK:

Q. You don't need to review the whole thing. It's a list. I wanted to ask about one project in particular, looking at the first and the fifth pages. The seventh project down from the top.

A. (Witness Grubb) You said first page, the seventh?

A. (Witness Valle) The first --

Q. Yeah. I mean, I believe that if you look at -- I mean, this is a spreadsheet that's been spread over.

A. (Witness Grubb) Yeah, page one of 16.

Q. Page one.

A. (Witness Grubb) And then you said the seventh one?

Q. Seventh one down, yes.

A. (Witness Valle) One, two, three, four, five.

Q. This is all trade secret, so I'm not going to identify the --

A. (Witness Grubb) No, I gotcha.

A. (Witness Valle) But just --

Q. -- name of the company.

A. (Witness Valle) -- just to make sure, is that the one in Hogansville City?

A. (Witness Grubb) No, he said that's the name of the trade secret.

Q. Again, that's a trade secret detail, so I can't -- it'd be a lot easier if y'all allowed us some more information here, but...

A. (Witness Grubb) Yeah. Well, it's the customer's trade secret information, so...

Q. Number seven.

A. (Witness Valle) It's number -- okay. Okay, I got you.

Q. It's the one two down from that one.

A. (Witness Grubb) Yeah.

A. (Witness Valle) Yep.

Q. Okay.

A. (Witness Grubb) Real long GPS coordinates, the third one with real long coordinates.

Q. Yes. This project is -- it's listed as a commercial data center inside Georgia Power's service territory with an announced load of 1,200 megawatts.

A. (Witness Grubb) When you go to the non -- yeah.

Q. Look at page five.

A. (Witness Valle) Give me a second to get there.

A. (Witness Grubb) Yes.

A. (Witness Valle) Okay.

Q. Okay. Now, this project is one of the contracts that has been -- that was submitted to staff for review; is that correct?

A. (Witness Valle) Yes, that's -- yes, that's correct.

Q. Okay. And the peak load that was identified in that contract -- for that project was 1,200 megawatts in the Q2 report; is that right?

A. (Witness Valle) Yes. That's correct.

Q. Now, what is the actual amount of load set forth in the contract that was signed?

A. (Witness Valle) It was lower than that.

Q. Okay.

A. (Witness Valle) I don't know. I'm sensitive about disclosing customer information, but it was lower

than that.

Q. How much lower? Significantly lower?

A. (Witness Valle) Well, if I give you the math, I'll give you the number.

A. (Witness Grubb) It's trade secret, yeah. It's all trade secret.

A. (Witness Valle) So let's say below 1,000.

Q. All right. Well, so that is a reduction in the load -- that would result in a reduction in the load forecast, that reduction from -- the forecast for this project versus what actually is in the contract; correct?

A. (Witness Valle) In the load forecast?

Q. Yes.

A. (Witness Valle) Not necessarily. So in the forecast, you will have two effects happening. So one is a reduction from -- so we reflected this load as highly likely by the time that we did the forecast. The contract came after we finished that. And so that reduction in megawatts is offset by the increase in likelihood. So there's offsetting factors for this particular customer.

Q. Mr. Valle, on page 15 -- I mean, I'm sorry, page 17 of your testimony, lines five through 11.

A. (Witness Valle) Page 17 -- okay. Nine to 11.

Q. The question was: Did the company meet with

the Commission staff to collaborate on the load forecast following the 2025 IRP; do you see that?

A. (Witness Grubb) Just one second, Mr. Pawluk. Page 17 of 20 on your testimony.

Q. Make sure I have the right page here. Do I?

A. (Witness Valle) Oh, okay. Give me a second, please.

A. (Witness Grubb) It's this one.

A. (Witness Valle) Okay. Perfect. I'm there. Sorry.

Q. Okay. And your answer was, "Yes, prior to filing the B-2026 load forecast and this testimony, the company met with Commission staff three times to discuss the company's refinements to its load forecast process and assumptions, and to consider staff's feedback and proposed revisions to the load forecast. The company will continue to meet with Commission staff during this proceeding to further collaborate and refine the load forecast."

This was something that was ordered by the Commission, that the company collaborate with the staff on revising the load forecast; correct?

A. (Witness Valle) Yeah, that's correct, Commissioners. It's part of the 2025 IRP stipulation that we needed to have these collaborations with Commission staff. Yes.

Q. Okay. I wanted to show you the document now.

MR. PAWLUK: Mr. Chairman, if Mr. Dix could approach.

CHAIRMAN SHAW: Go ahead.

BY MR. PAWLUK:

Q. So this was a memorandum from staff to the company, is that correct, dated September 11th, 2025?

A. (Witness Valle) Yes, yes.

Q. And this was a part -- this was a part of that collaboration and that process that you described; isn't it?

A. (Witness Valle) That is correct, yes.

Q. All right. So staff's recommendation -- or one of staff's recommendations, and I'm looking here under "contract execution, materialization requirement." Staff -- and this is not a trade secret document, but it contains some trade secrets, which is -- which is why I'm just going to refer to it, and I have not provided it to the court reporter and it will not be part of the record. But I'm just going to read from it: "Given the risk to existing customers and the speculative nature of these projects, the company must provide executed contracts for electric service for all large load customers prior to the certification of associated capacity resources."

MS. PRYOR: Objection. This document's not

part of the record, as Mr. Pawluk just noted, and you can't just read into it the record, being from something that's not in the record.

MR. PAWLUK: Well, that's fine, Mr. Chairman. I can just -- I can summarize for the upshot.

BY MR. PAWLUK:

Q. Staff's recommendation, as reflected in this memo to the company, was that as part of the load materialization model, staff recommended that no generation assets be certified unless there was contracts for electric service that were signed to support that load; is that correct?

A. (Witness Valle) That is correct, Commissioners. And again, I'm going to reiterate what I said earlier. Adopting that assumption would severely under forecast our load. It would underestimate our customer needs. And just to go a little bit farther, we studied -- I mean, we took staff's recommendations seriously.

We looked at all of these inputs. We looked at all of the recommendations in detail, and their approach doesn't count risk factors in the load realization model. It only focuses on contracted load, which would drive our projection for large loads down to about a gigawatt. If we were to implement all of the

recommendations, we would be talking about something close to a gigawatt, which would drive reliability down.

It represents only -- less than 20 percent of our contracted load and less than 10 percent of our commitments. The gap that we're seeing in this recommendation is not a rounding error, it's the philosophical difference between planning for growth and benefits to our customers versus planning for our resource constraints system.

And so this recommendation would really jeopardize system reliability and undermine our ability to serve our customers. Georgia's economic development depends on a power system that anticipates growth. So just for the get-go, looking at the recommendation of only looking at contracted load, it undermines our growth prospects and the future attractiveness of our state for being the number one state for doing business.

A. (Witness Grubb) And Commissioners, if you -- if we had followed this and waited until everything was signed for contract for electric service, we would have never come forward in the '23 IRP Update saying there is a lot of large load coming to the state. Because if you remember, it was, what, maybe 1,000-megawatts was committed at that point. And that was RFSs and everything.

And so we saw this new sector of the economy that is growing, that we saw indications it was coming to Georgia. We forecasted that, Mr. Valle developed the large load model. The whole process for the '23 IRP Update through the '25 IRP, adding the capacity RFP resource capacity range, all of that, and now getting contracts to put downward pressure on rates on everybody, we would be two or three years behind that. Because every forecast has projected growth in it. Yes, it's a bigger impact here. But if you only waited until it was executed, we would not be able to grow and stay ahead of it. You can build load growth faster than you can build generation transmission, so we've got to stay ahead of it.

The other part that would be difficult is the reason we're able to calculate the cost in the rules and reg contracts, to make sure that we're covering our costs, is because we are planning for that load. We know what resources and projects are needed to serve that load. If you waited to plan, you wouldn't even have any numerical information to provide the customer on what it was going to cost them.

So the way that we've done it, the way that this Commission's process allows us to forecast it and approve resources, is what's enabling the growth and allowing that momentum that we see.

Q. Now, the company performed -- and I'm going back to the RFP process here. So I think we're -- I think we're done with load forecast, Mr. Valle. And I appreciate all your responses there.

The company performed a confidential ranking analysis as part of the RFP evaluation. And that analysis compared the cost and benefits of the resource alternatives, recognizing that some projects would be more cost effective and hence more attractive to select first compared to other resources; is that correct?

A. (Witness Looney) The company did perform an evaluation based on the criteria that was agreed upon with the Commission staff and the IE. And that evaluation is very informative in the cost effectiveness of the resources and provides a ranking of resources relative to one another.

Q. Okay. And, conversely, based on the ranking analysis, there are some projects that would be less cost effective, and it would be economic to defer those to be selected later in favor of more economic projects that wound up higher in the ranking analysis; correct?

A. (Witness Looney) I don't think the ranking analysis suggests that some projects should be deferred. The company's position is that we should select all the projects that are needed to meet the load forecast, and

projects that aren't needed to meet the forecast should not be selected. Projects that are needed to meet load forecasts should be selected. And we have a ranking that helps show the relative positioning of those and and provide an ultimate short list of resources for a portfolio of certification.

Q. Would you say that the average fixed cost of the portfolio at an NPV-dollar-per-megawatt basis goes up as more of the less favorable projects are selected or approved?

A. (Witness Looney) Again, I don't think we have any less favorable projects. We have a very robust portfolio of projects that meet the capacity need. Generally speaking, they are ranked from least costly, on a net basis, to most costly. And one of the components that might make a project on the higher end of the rank, less cost effective or more costly, would be fixed cost. But there's a lot of things involved in the ranking: Fixed costs, energy benefits, term equalization. And so it's difficult to isolate any one of them without holistically looking at the results of the portfolio.

Q. And I also have a few questions about the PPAs. The company is requesting additional sum for PPAs that were identified based on competitive solicitation and were identified as supplemental resources outside of the

competitive solicitation; correct?

A. (Witness Grubb) Yes. We're asking for the additional sum on all the PPAs filed for certification.

Q. All right. And these PPAs include both thermal, renewables, storage resources, and some of these resources may provide seasonal or ELCC adjusted capacity value to the system, which is less than the nameplate capacity; correct?

A. (Witness Grubb) Could you go through that one more time? There was a lot in there.

Q. It's a long question. And these PPAs include both thermal, renewable, and storage resources. And some of these resources may provide seasonal or ELCC adjusted capacity value to the system, which is less than the nameplate capacity.

A. (Witness Grubb) Correct. There aren't renewable-only resources that we're seeking that on. There are renewables with some storage, but yes, it's thermal, and the BESS -- well, not on the PPAs, we don't. That's right. So it's storage -- it's storage in the PPAs and thermal in the PPAs. So we're asking for additional sum on all of those.

Q. Regarding the BESS resources, some of these may have a larger nameplate value than the firm capacity value considered in the company's planning analysis;

correct?

A. (Witness Grubb) This is from a capacity equivalency point?

A. (Witness Looney) Well, specifically for BESS projects, there's two potential ELCC adjustments. One is the sort of core ELCC analysis that generally represents that the more like-kind, energy-limited resources that you add to a system, the less valuable the incremental one is. And we had an ELCC process that was reviewed with staff and the IE and agreed upon for the evaluation. And so some of the BESS resources have an ELCC that's less than 100 percent.

Secondly, some of the resources that the PPAs represent are paired with existing solar resources that are already receiving some capacity value. So when you add a battery to a facility that's already receiving some capacity value, you need to be careful not to double count. So there's potentially a secondary adjustment made to represent the fact that some of the capacity that that shared point of interconnection facility can provide was already allocated to the solar. And so you have those two impacts that provide sort of the final, incremental, reliable capacity that would be used in the resource ledger purposes.

Q. All right. And the reason we're here today

is because of a forecasted capacity need, or at least the company's forecasted capacity need; correct?

A. (Witness Grubb) Yes, that is correct.

Q. So the adjusted capacity value is an important part of the evaluation in determining how many resources are needed; correct?

A. (Witness Grubb) Yes. We capture capacity equivalents for all the resources.

Q. So in this case, wouldn't it be reasonable for the Commission to base the additional sum on the firm capacity value when setting the amount of the additional sum it decides to grant?

A. (Witness Grubb) No, our recommendation is at nameplate. I know that, subject to check, I think on the renewable RFP, PPAs which have capacity factor -- or capacity equivalence adjustments, we still get that on nameplate. So just because the unit has a different capacity equivalence, you still get the value of that four-hour battery for energy arbitrage, operating reserves, and all the other aspects. So our recommendation is based on nameplate to be consistent with how we've done solar.

Q. But you do agree that the proposed resources, especially the near BESS projects, aren't fully deliverable at their nameplate capacity?

A. (Witness Grubb) That doesn't take away the fact that they are contributing and they provide operating reserves and energy arbitrage opportunities. But, yeah, we capture that in the evaluation and we capture that in our planning.

Q. Regarding the PPAs, the company believes it would be beneficial to have some of the certified resources be based on PPAs; correct?

A. (Witness Grubb) Can you say that again? I'm sorry.

Q. It's a simple question -- regarding the PPA, the company believes it would be beneficial to have some of the certified resources be PPAs?

A. (Witness Grubb) Yeah, I mean, that was what was proposed in. We selected PPAs. I mean, yes -- I mean, your question is, do we prefer it? That's what was -- that was bid in and was selected.

A. (Witness Looney) Yeah. But, I mean, I think the company's objective is to identify the lowest cost portfolio of resources that are available to us. Generally speaking, that does include some PPAs. And I think we do appreciate the diversity of ownership that that provides, but it's not necessarily an objective function for the evaluation or a requirement for the PPA to be -- I mean, for the RFP to be successful.

Q. Well, won't the PPAs help reduce the company's risk of having so much on its plate, which could minimize construction delays and other risks?

A. (Witness Grubb) So -- go ahead, you got it.

A. (Witness Curylo) I think that that lends itself to the diversity, the resource diversity that Mr. Looney spoke to. And the contracting diversity is very important to us. And the way that we're able to call on specific resources at different times. The contracting provisions we have for PPAs is specific, and that's different from how we're able to operate the owned assets that we have as well. So that just is an element of the diversity that Mr. Looney was speaking to.

A. (Witness Grubb) Yeah. And we do value PPAs. When you look at how many RFPs we've run in the last 20 years, and the fact that we've got, you know, up to the 30 percent in some years, there's a lot of value to PPAs. But this certification is a combination of all of those.

A. (Witness Looney) I do think it would be an error to simply say a PPA is less risky than a company-owned facility. They have different risks. And so the diversity of risk could potentially lower the overall magnitude of risk, but any individual project that's a PPA is not necessarily less risky than an individual project that's a company-owned facility.

(The documents referred to were marked for identification as PIA Staff Exhibit 10.)

BY MR. PAWLUK:

Q. All right. I have one more exhibit that I want to show y'all. It's been marked STF-PIA-10 and has been provided to the court reporter. And y'all may have referenced this earlier, but I think it'd be useful to ask a couple of questions on.

One of the Commissioners might have asked, you know, earlier, how will GPC -- I think it was -- I think it was the Chairman, Mr. Shaw asked, how will GPC change its plans if the projected load growth materializes slower than anticipated, or some of the load doesn't materialize at all? Do you see that?

A. (Witness Grubb) Yes, I do.

Q. Okay. And the company's response was a list of possible options, reducing the size needs of procuring future requests for proposals, delay the timing of future RFPs, pause or delay, cancel resources being constructed, accelerating load ramps, considering load changes when evaluating existing resources or programs, or selling capacity beyond what is needed to satisfy the target reserve margin.

Do y'all see those options there?

A. (Witness Grubb) Yes. I think it's important

to note that, prior to listing those options, we said we would, you know, update it in our annual planning process to see if there's actions that are needed. But, yes, we did list those as options.

Q. And I think this is something that I asked during the IRP hearings, but I just wanted to ask again, have the company's resource and planning teams developed a formal plan for implementing these measures, if the load from the large load customers does not materialize as forecasted, including a priority of actions to be taken corresponding to metrics developed from the forecast or from actual customer use data? I'm asking about a formal plan.

A. (Witness Grubb) Yeah. No, no, we don't. I mean, our plan is the one that we've brought to the Commission where the load forecast supports the need for the certification of the 90 -- the 9,900-plus megawatts. So we have not done a formal plan because we understand that what we have in our case supports the resources we need. We have sold through SWE -- the Commission probably remembers in the '23 IRP update, we had the Mississippi and the Santa Rosa PPAs that we contracted for five years. We didn't need them for the first two, from a target reserve margin standpoint, and we sold those to some other local entities. So we have not put together a formal plan

because, again, it's going to be based on what comes out of this filing proceeding. But we do not have a formal plan laid out if the loads do not show up. We know these are options, and as things change and as things adjust, we'll adjust because -- we're looking at least annually, if not more often.

A. (Witness Looney) Yeah, we do have an annual planning process that accounts for the latest load forecast available every year. We very formally file an IRP every three years that would account for the latest load forecast, the resource ledger, and any modifications that the company would deem to be appropriate. And so while there's no -- we haven't developed that formal plan today, there is a well-established process in place that would accommodate the formalization of those plans as they became appropriate, with the full oversight and approval of the Commission.

A. (Witness Grubb) Which is what we note in the first part of that response.

MR. PAWLUK: Mr. Chairman, those are all the questions that I have for the panel. I would move that staff's cross-examination of exhibits be entered into the record as marked.

CHAIRMAN SHAW: So marked.

(PIA STAFF Exhibits 1 through 10 were

admitted into evidence.)

MR. PAWLUK: Gentlemen, ladies, I appreciate you answering staff's questions this afternoon.

MR. GRUBB: Thank you, Mr. Pawluk.

MR. VALLE: Thank you.

CHAIRMAN SHAW: All right. Mr. Jones?

MR. JONES: No questions, Mr. Chairman.

CHAIRMAN SHAW: Trying to -- trying to get get a little idea on time, because we're going to have a hard stop in probably at about 5:40. And so it may be better just to go ahead and stop here rather than -- so Georgia Interfaith Power & Light, would y'all want to go for -- until then or wait until -- start in the morning?

MR. SHERRIER: We'll wait until the morning.

CHAIRMAN SHAW: I'm assuming that everyone's in agreement with taking a break at this point. That also will give staff a little more time to make sure they've got everything tweaked on the audio system, so I appreciate their efforts. Thanks for everybody's time. Panel, we'll let y'all be excused until in the morning. We'll get back started at 9:30, and hopefully we can -- maybe we can just -- just might be -- I would just go ahead and tell you to be prepared to possibly stay

later tomorrow, if we needed. So if it's close, we'll try to get it finished. Okay. But thank y'all very much. We'll see y'all in the morning.

(Hearing adjourned at 5:23 p.m.)

C E R T I F I C A T E

We, Kelley Nadotti and Brenda P. Elwell, Certified Court Reporters, do hereby certify that the foregoing transcript is an accurate record to the best of our abilities of the proceedings in the above-entitled matter at the time and place therein set forth.

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Kelley Marie Nadotti, RPR
CCR-6256-8388-8026-4192

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Brenda P. Elwell, RPR, CCR, B-2023