BEFORE THE
GEORGIA PUBLIC SERVICE COMMISSION

In Re: Georgia Power Company’s 2022 Rate Case) Docket No. 44280)

JOINT APPLICATION FOR LEAVE TO INTERVENE OF
GEORGIA SOLAR ENERGY INDUSTRIES ASSOCIATION,
SOLAR ENERGY INDUSTRIES ASSOCIATION,
AND VOTE SOLAR.

The Georgia Solar Energy Industries Association (“GASEIA”), the Solar Energy Industries Association (“SEIA”), and Vote Solar, through counsel, hereby apply to the Georgia Public Service Commission (“Commission”) for leave to intervene in the above-referenced docket pursuant to O.C.G.A. §§ 46-2-59 and 50-13-14 and Commission Rule 515-2-1-.06. In support of this application, GASEIA, SEIA, and Vote Solar (hereinafter “Petitioners”) respectfully show the Commission as follows:

1.

On April 7, 2022, the Commission issued a Procedural and Scheduling Order in Docket No. 44280 (“April 7 Order”). Pursuant to that order, Georgia Power Company (“Georgia Power” or “the Company”) filed its 2022 Rate Case on June 24, 2022 for Commission approval and subsequently notified the Commission that its first public notice of the 2022 Rate Case was published on July 7, 2022. Pursuant to the April 7 Order, this application is timely filed.
2.

GASEIA is a non-profit corporation organized and existing under the laws of the State of Georgia. GASEIA is a trade association consisting of individuals, businesses, and other entities that promote the economic and environmental benefits of solar energy generation in Georgia. GASEIA’s mailing address is P.O. Box 480, Avondale Estates, GA 30002.

3.

GASEIA and its members have a substantial interest in the above-referenced proceeding. GASEIA members own and operate businesses based in Georgia and have deployed solar generation and battery storage projects throughout Georgia, including behind-the-meter solar projects and other distributed energy resources ("DERs"). GASEIA members are planning to develop, construct, operate, and otherwise service future behind-the-meter solar projects and other DER projects in Georgia, the success of which will rely on the results of these proceedings and the approval (in whole or in part) of tariff changes and proposals related to the Company’s 2022 Rate Case, including but not limited to: discussion of proposed changes to tariffs for compensating customers with behind-the-meter solar systems and other DERs, including the RNR Monthly Netting program under the Company’s RNR-10 tariff and the Customer DER Program and approved in the 2022 Integrated Resource Plan; issues relating to the Company’s development of a DER management system; and the impact for solar customers of the Company’s proposal to end the volumetric “R” tariff for new construction residential customers. GASEIA members impacted by this Rate Case are numerous, and intervention by individual members would be unduly burdensome.
4.
SEIA is a non-profit corporation organized and existing under the laws of the District of Columbia. SEIA is the national trade association of the U.S. solar energy industry and represents organizations that promote, manufacture, install, and support the development of solar energy throughout the country and in Georgia. SEIA’s mailing address is 1425 K Street, N.W., Suite 1000, Washington, D.C. 20005.

5.
Since 1974, SEIA has been a driving force in the building of a strong solar industry in America and in the advancement of solar energy and energy storage technology. SEIA works with over 1,000 member companies and other strategic partners to advocate for policies that promote solar jobs in diverse communities and for market rules that promote competition, fairness and the growth of reliable, low-cost solar power. Collectively, these organizations employ more than 260,000 people in the United States. SEIA engages in advocacy and education to foster solar development by expanding markets, removing market barriers, and educating the public on the benefits of solar energy. SEIA actively participates in state public utility commission proceedings, testifies before state legislative bodies, and hosts seminars and events on solar policy issues, including an annual Solar and Energy Storage Southeast conference, now known as “RE+ Southeast.”

6.
SEIA and its members have a substantial interest in the above-referenced proceeding. SEIA has members that own and operate solar generation projects throughout Georgia; members that install and maintain behind-the-meter solar and DER systems; members with local employees in the state; and members that list specific operating addresses in Georgia. SEIA members are planning to
develop, construct, operate, and otherwise service future behind-the-meter solar projects and other DER projects in Georgia, the success of which will rely on the results of these proceedings and the approval (in whole or in part) of tariff changes and proposals related to the Company’s 2022 Rate Case, including but not limited to: discussion of proposed changes to tariffs for compensating customers with behind-the-meter solar systems and other DERs, including the RNR Monthly Netting program under the Company’s RNR-10 tariff and the Customer DER Program and approved in the 2022 Integrated Resource Plan; issues relating to the Company’s development of a DER management system; and the impact for solar customers of the Company’s proposal to end the volumetric “R” tariff for new construction residential customers. SEIA members impacted by this Rate Case are numerous, and intervention by individual members would be unduly burdensome.

7.
Vote Solar is an independent 501(c)(3) non-profit working to repower the United States with clean energy by making solar power more accessible and affordable through effective policy advocacy. Vote Solar seeks to promote the development of solar at every scale, from distributed rooftop solar to large utility-scale plants. Established in 2002, Vote Solar has over 80,000 members nationally, including 434 members in Georgia, some of whom reside within Georgia Power’s service territory. Vote Solar is not a trade group, nor does it have corporate members. Vote Solar has its principal place of business at 360 22nd St, Suite 730, Oakland, CA 94612.

8.
Vote Solar has actively participated in commission proceedings concerning resource procurement, solar valuation, and distributed generation program design in numerous states across the country, including Georgia, Florida, North Carolina, Louisiana, Arizona, California, Colorado, Idaho, Massachusetts, Minnesota, Nevada, New Mexico, New York, Utah, Vermont
and Wisconsin. This includes active participation in Georgia Power’s application for approval of its 2016, 2019, and 2022 Integrated Resource Plans.

9. Vote Solar has a substantial interest in the subject matter of this proceeding. Vote Solar’s members include owners and potential buyers of behind-the-meter solar and DER systems whose rates would be directly impacted by proposed changes to Georgia Power’s RNR-10 tariff and other rates relating to behind-the-meter solar, DERs, and community solar. The outcome of this proceeding will significantly impact these interests and the goals of Vote Solar and its members to promote growth and accessibility of solar generation in Georgia.

10. The interests of GASEIA, SEIA, and Vote Solar and their participating members are not adequately represented by other parties to these proceedings. Other parties that have applied to intervene do not have interests similar to those of GASEIA, SEIA, and Vote Solar. The applicants’ intervention will not unduly delay the proceedings or prejudice the rights of other parties.

11. GASEIA, SEIA, and Vote Solar respectfully request that they be granted leave to intervene and participate fully as parties in these proceedings, including the right to present direct testimony and exhibits, cross-examine witnesses, and file and filing proposed orders and briefs. GASEIA, SEIA, and Vote Solar have not yet finalized plans for direct testimony but expect to present one or more expert witnesses to address rate design issues relating to renewable energy, DER tariffs and, the impact of renewable energy adoption on other customers.
12.

GASEIA, SEIA and Vote Solar respectfully request that the following persons receive all notices, correspondence and copies of orders and other materials in this docket, and be placed upon the official service list:

Scott Thomasson
Thomasson Law, LLC
1025 Bond Street
Macon, GA 31201
scott@thomassonlaw.net

WHEREFORE, GASEIA, SEIA and Vote Solar respectfully request that the Commission grant this application for leave to intervene and admit them as full parties of record in these proceedings with all rights attendant thereto.

Respectfully submitted this 5th day of August, 2022.

Scott Thomasson
Thomasson Law, LLC
1025 Bond Street
Macon, GA 31201
(202) 670-7601
scott@thomassonlaw.net
Georgia Bar No. 707202
Counsel for GASEIA, SEIA, and Vote Solar
VERIFICATION

STATE OF GEORGIA
COUNTY OF FULTON

Scott Thomasson personally appeared before the undersigned Notary Public and stated under oath that he is an attorney for GASEIA, SEIA, and Vote Solar and is authorized to execute this verification on their behalf and that on her information and belief the facts alleged in the foregoing Application to Intervene are true and correct to the best of his knowledge.

This 5th day of August, 2022.

Scott Thomasson
Counsel for GASEIA, SEIA, and Vote Solar

Sworn to and subscribed before me this 5th day of August, 2022.

Notary Public
CERTIFICATE OF SERVICE

I certify that the foregoing Joint Application of GASEIA, SEIA and Vote Solar for Leave to Intervene in Docket No. 44280 was filed with the Public Service Commission by electronic delivery on the 5th day of August, 2022. An electronic copy of same was served upon all parties listed below by electronic mail as follows:

Scott Thomasson
Counsel for GASEIA, SEIA, and Vote Solar
Sallie Tanner  
Executive Secretary  
Georgia Public Service Commission  
244 Washington Street, SW  
Atlanta, Georgia 30334  
stanner@psc.ga.gov

Jamie Barber  
Alex Davis  
Preston Thomas  
Robert Trokey  
Georgia Public Service Commission  
244 Washington Street, SW  
Atlanta, Georgia 30334  
jamieb@psc.ga.gov  
adavis@psc.ga.gov  
pthomas@psc.ga.gov  
rtrokey@psc.ga.gov

Kevin Greene  
Steven Hewitson  
Brandon Marzo  
Allison Pryor  
Troutman Pepper  
Nations Bank Plaza  
600 Peachtree St., NE, Suite 3000  
Atlanta, Georgia 30308  
kevin.greene@troutman.com  
steven.hewitson@troutman.com  
brandon.marzo@troutman.com  
allison.pryor@troutman.com

Emily W. Medlyn  
General Attorney  
U.S. Army Legal Services Agency  
ELD Division  
9275 Gunston Rd  
Fort Belvoir, Virginia 22060  
Telephone: (703) 614-3918  
emily.w.medlyn.civ@army.mil

Kelley Balkcom  
Kyle Leach  
Mark Vinson  
Georgia Power Company  
Regulatory Affairs Bin 10230  
241 Ralph McGill Blvd., N.E.  
Atlanta, Georgia 30308-3374  
mmcclosk@southernco.com  
mvison@southernco.com  
kleach@southernco.com

Bryan Jacob  
Southern Alliance for Clean Energy  
1455 Hampton Hill Drive  
Alpharetta, Georgia 30022  
bryan@cleanenergy.org

Katie Southworth  
William Collier  
Southface Energy Institute  
241 Pine Street, NE  
Atlanta, Georgia 30308  
ksouthworth@southface.org

Robert B. Baker  
Robert B. Baker, PC  
2480 Briarcliff Road, NE, Suite 6  
Atlanta, Georgia 30329  
706-207-5002  
bobby@robertbbaker.com

Ben J. Stockton, PE, MBA  
Concerned Ratepayers of Georgia  
2230 Allen Road  
Macon, Georgia 31216  
404-924-5336  
encomanager13@gmail.com
Charles B. Jones, III  
Lloyd Avram  
Roy Bowen  
Georgia Association of Manufacturers  
The Hurt Building  
50 Hurt Plaza, Suite 985  
Atlanta, Georgia 30303  
rbowen@gamfg.org  
lavram@gamfg.org  
cjones@gamfg.org

Jeffry Pollock  
J. Pollock Incorporated  
12647 Olive Blvd., Suite 585  
St. Louis, Missouri 63141  
jcp@jpollockinc.com

Jim Clarkson  
Resource Supply Management  
135 Emerald Lake Road  
Columbia, South Carolina 29209  
jclarson@rsmenergy.com

Dante Mugrace  
PCMG and Associates  
90 Moonlight Court  
Toms River, NJ 08753  
dmugrace@pcmggregcon.com  
Kurt J. Boehm, Esq.  
Jody Kyler Cohn, Esq.  
BOEHM, KURTZ & LOWRY  
36 East Seventh Street, Suite 1510  
Cincinnati, Ohio 45202  
Telephone: 513-421-2255 Fax: 513-421-2764  
E-mail: kboehm@bkllawfirm.com  
jkylercohn@bkllawfirm.com

Steven C. Prenovitz, MBA  
Concerned Ratepayers of Georgia  
4295 Amberglade Ct.  
Norcross, Georgia 30092  
770-448-8978  
scprenovitz@gmail.com

Liz Coyle  
Georgia Watch  
55 Marietta Street NW, Suite 903  
Atlanta, Georgia 30303  
lcoyle@georgiawatch.org

Alan R. Jenkins  
Jenkins at Law, LLC  
2950 Yellowtail Ave.  
Marathon, Florida 33050  
(404) 729-2037  
aj@jenkinsatlaw.com

Jennifer Whitfield  
Jillian Kysor  
Southern Environmental Law Center  
Ten 10th Street, NW, Suite 1050  
Atlanta, GA 30309  
jwhitfield@selcga.org  
jkysor@selcga.org

Nicole R. Barnett Slaughter  
H. Mark Hamlet  
Sarah E. Morin-Gage  
Jason Allen  
Hamlet Law  
5215 Junction Park Circle, Suite 202  
Wilmington, North Carolina 28412  
nslaughter@hamlet-law.com  
mhamlet@hamlet-law.com  
smorin-gage@hamlet-law.com  
jallen@hamlet-law.com
Kevin Higgins  
Justin Bieber  
ENERGY STRATEGIES, LLC  
215 South State Street, Suite 200  
Salt Lake City, Utah 84111  
Ph: 801-355-4365 Fax: 801 5219142  
khiggins@energystrat.com  
jbieber@energystrat.com  

Nina R. Hickson  
City of Atlanta  
55 Trinity Avenue SW  
Suite 5000  
Atlanta, Georgia 30303  
404-546-4600  
NinaRHickson@AtlantaGa.Gov  

Scott F. Dunbar  
Keyes & Fox LLP  
1580 Lincoln St., Suite 1105  
Denver, CO 80203  
(949) 525-6016  
sdunbar@keyesfox.com  

Nikhil Vijaykar  
Jason Keyes  
Keyes & Fox LLP  
580 California St. 12th Floor  
San Francisco, CA 94104  
(408) 621-3256  
vijaykar@keyesfox.com  
jkeyes@keyesfox.com  

Mike Wharton  
Athens-Clarke County Unified Government,  
Sustainability Office  
110 Bray Street  
Athens, GA 30601  
706-613-3838  
Mike.Wharton@accgov.com  

Newton M. Galloway  
Terri M. Lyndall  
Galloway & Lyndall, LLP  
406 North Hill Street  
Griffin, Georgia 30223  
galloway@gallyn-law.com  
tlyndall@gallyn-law.com  

Robert Jackson, Esq.  
Robert B. Jackson, IV, LLC  
260 Peachtree Street - Suite 2200  
Atlanta, Georgia 30303  
rbj4law@gmail.com  

Isabella Ariza, Esq.  
Sierra Club  
50 F Street NW, 8th Floor  
Washington, D.C. 20001  
isabella.ariza@sien:aclub.org  

John R. Seydel  
City of Atlanta Office of Resilience  
55 Trinity Avenue  
Atlanta, GA 30303  
470-421-6160  
Jrseydel@atlantaga.gov  

David Nifong  
City of Decatur, Department of Public Works  
2635 Talley Street  
Decatur, GA 30030  
404-295-2764  
david.nifong@decaturga.com  

Alicia Brown  
City of Savannah, Office of Sustainability  
801 E. Gwinnett Street  
Savannah, GA 31401  
912-651-6838  
alicia.brown@savannahga.gov
Deborah Opie
Brionte McCorkle
Georgia Conservation Voters Education Fund
725 Ponce De Leon Ave FL 2
Atlanta, GA 30306
(404) 955-7013
deborah@gcvoters.org
brionte@gcvoters.org

Trudy Jones
dr.twj1@gmail.com
Tia Brightwell
brightwelltia35@gmail.com
Terry Cummings
cummingsterry3@gmail.com
Shelia Edwards
shelia@trappcomm.com
Sandra Willis
mssanwil@gmail.com
Mckelson Fraser
mckelsonfraser@yahoo.com
Linda Gray-Clark
linda.clark64131990@outlook.com
James Riles
jrismoney@aol.com
Harriet Feggins
olivialoveu78@gmail.com
Fenika Miller
fenikamiller@gmail.com
Eugene Vickerson
eugenevickerson@gmail.com
Eddie White
Edman1226@gmail.com
Dorothy Burnam
dorothyburnam@icloud.com
Cynthia Tucker
cynthiatucker34@yahoo.com
Cynthia Pryor
skeetscynthia@yahoo.com
H. Benjamin Williams
docben@att.net
Christopher Stathums
christathums@gmail.com
Chequeta Riles
criles111@aol.com
Carol Dollison
directordoll@yahoo.com
Brandon Winn
Coronerbrandomichael@gmail.com
Anita Garnes
anitagarnes17@gmail.com
Tara Opie
Tarakspecializes@gmail.com
Brendalyn Gardner
mimi2y2byazphil@gmail.com
Candace Woodall
choreografti60@yahoo.com
Sharrita Harden
ritaharden73@gmail.com

Georgia Conservation Voters Education Fund
725 Ponce De Leon Ave FL 2
Atlanta, GA 30306
(404) 955-7013