COPY

BEFORE THE
GEORGIA PUBLIC SERVICE COMMISSION
STATE OF GEORGIA

Georgia Power Company's 2016 Integrated Resource Plan and Application for Decertification of Plant Mitchell Units 3, 4A and 4B, Plant Kraft Unit 1 CT, and Intercession City CT	]	Docket No. 40161
And	]	
Georgia Power Company's Application for the Certification, Decertification, and Amended Demand Side Management Plan	]	Docket No. 40162

FILED
JUN 29 2016
EXECUTIVE SECRETARY
G.P.S.C.

Post-Hearing Brief of the Southern Alliance for Clean Energy, Inc.

COMES NOW, the Southern Alliance for Clean Energy, Inc. (hereafter "SACE"), pursuant to Commission Rule 515-2-1.04 and the Commission's February 19, 2016, Procedural and Scheduling Order in the above-referenced dockets, and hereby files its post-hearing brief. SACE recommends that the Commission adopt limited changes to the proposed Stipulation between the parties in Dockets 40161 and 40162, and also offers arguments regarding issues that are unresolved by the Stipulation.

Index of Arguments

Argument and Citation of Authority

I. SACE Generally Accepts the Stipulation as a Compromise Reflecting Positions Argued During the Proceedings, But Recommends the Commission Increase Benefits to Customers By Amending Provisions Related to Renewable Energy

SACE generally accepts the Stipulation as a compromise. While SACE argued several positions that were not adopted in the negotiations between the Company and the Advocacy Staff, SACE appreciates the willingness of those parties to compromise, recognizing that many of the issues will not be resolved by the Commission. Nonetheless, SACE recommends that the Commission make three changes to the Stipulation.

A. SACE Recommends That the Commission Increase the REDI Program to 2,000 MWs, With Selection of Wind PPAs Capped at 500 MWs of the 2,000 MWs

The Stipulation recommends that the Commission approve a REDI Program of 1,200 MWs, plus other programs that will result in over 400 MWs of renewable energy, including the solar self-build, Commercial and Industrial and coal ash pond programs. The Stipulation also recommends that the REDI program be restricted to no more than 300 MWs of wind power.

In the last IRP/DSM case, Dockets 36498 and 36499, SACE asked the Commission to support development of 600 MWs of new solar development. The Commission boldly created the ASI Advanced Program and approved 525 MWs of new solar development. Later, the Commission approved development of 151 MWs of utility scale solar generation at five Georgia military installations. All of this new solar development has been successful and not put upward pressure on customer rates. The Commission's decisive action made Georgia a national leader in renewable energy development and helped provide a vital incentive to an emerging industry in Georgia.

This Commission has the opportunity now to consider another bold action to increase the REDI Program from the Stipulation of 1,200 MWs to 2,000 MWs. The Stipulation has reasonably adopted a multi-year development period with safeguards incorporated into the REDI Program request for proposal process to ensure that contracts will be granted only to renewable energy projects that offer prices below Georgia Power Company's Renewable Cost Benefit Framework value and provide long-term savings to customers. Opportunities to lock in competitive market prices are available now.

Neither the Company's proposed cap of 525 MWs nor the Stipulation value of 1,200 MWs are based on any analytical study (Tr. 225 and 525), but is based on the Company's idea to take a "very disciplined incremental approach." (Tr. 221) The Company does not view the net

savings that would result from procuring renewable energy at prices below the RCB Framework value as a "compelling reason to do more." (Tr. 2106) SACE's testimony recommended that the Commission consider values up to 4,000 MWs, a level at which there could be operational concerns. Other parties variously advocated for 1,200 MWs, 2,000 MWs or simply urged consideration of higher values.

Although neither Georgia Power Company nor Staff, nor any other intervenor advocated for a limit on wind energy. The 300 MWs cap on wind energy appears to respond to concerns raised during the proceeding. SACE did indicate that there will be some limit as to the amount of wind energy that can be delivered via transmission to the Southern Company transmission system, and then delivered to Georgia Power. However, this limitation needs to be understood in the context of specific proposals and is not appropriately implemented through a cap on wind energy. Furthermore, this limitation can only result in unchanged or reduced net benefits to Georgia Power customers. Nonetheless, if the Commission wishes to cap wind energy, the cap (proposed at 25% of the Stipulation value of 1,200 MWs) should be increased proportionately with an increase in the REDI Program.

Accordingly, SACE recommends that the Commission revise the Stipulation to increase the REDI Program to 2,000 MWs with the cap on wind energy increased to at least 500 MWs, which would increase net savings to customers.

B. SACE Recommends That the Commission Revise the Procurement Schedule for the REDI Program to Maximize Cost-Effectiveness

The Stipulation describes two separate Requests for Proposals ("RFPs"), one in 2017 and one in 2019. In-service dates are indicated for 2017, 2018, 2019 and 2020. The Stipulation does not specify the amount of REDI capacity that may be procured in each year, in contrast to the proposed REDI program.

SACE recommends that the Commission move the second RFP up to 2018. It is our understanding that there may be tax advantages or other cost savings opportunities that solar or wind developers may be able to leverage for projects that include delivery in 2019 or 2020 if they are able to complete the contract in 2018. It is also our understanding that solar or wind developers will be able to reasonably anticipate cost trends through 2020 by 2018, and thus bids offered in 2018 should be able to reflect any future cost savings.

SACE also recommends that the Commission indicate that bids received in 2017 include projects scheduled for delivery in any of the four years. For example, a project that requires several years of lead time could be proposed for 2017 with delivery in 2020. The Commission may even wish to allow the REDI Program to schedule deliveries in 2021 if the bid indicates that the most cost-effective bid can be delivered on that schedule.

C. SACE Recommends That the Commission Provide More Specific Direction and Inclusion Into the Resolution of Issues Related to the Renewable Cost Benefit Framework ("RCB")

The Stipulation provides for use of avoided energy and deferred generation capacity components and other details in what appears to represent a phase-in of the RCB Framework. SACE supports this aspect of the Stipulation as a reasonable compromise between the parties.

However, the Stipulation also describes a four month process between the Company and Staff to develop a process and recommendations for implementation of the RCB. This process excludes interested and supportive stakeholders from participating in the collaboration between the Company and Staff. This exclusion is not in the best interests of Georgia Power's customers as it may overlook best practices.

SACE recommends that the Commission order that the RCB Framework shall be developed by the Company and Staff, and that they shall mutually agree on at least two additional intervenors to participate in those discussions, with full access to materials used to revise and improve the RCB Framework.

The Commission should act on our recommendations because testimony clearly demonstrated that the different perspectives will help inform and improve the final RCB Framework. Notably, each testimony that critically evaluated the RCB Framework identified different issues. Considering that the Company intends for the RCB Framework to be utilized in various proceedings, each with an opportunity for intervenor participation, the Commission surely would prefer that relevant issues be identified and potentially resolved prior to receiving the recommendations of the Company and Staff. The Commission should find that this level of engagement can only benefit the customers whose interests it represents, and direct the Company and Staff to include intervenors in the collaboration to develop their recommendations for implementation of the RCB Framework.

The specific technical provisions that SACE recommends should be addressed in the final RCB Framework are:

(1) Simplifying the calculation of energy and capacity costs, (Docket 40161, Direct Testimony of John D. Wilson, p. 27);

(2) Specifying a consistent method for determining capacity equivalence, (Id.);

(3) Specifying that support capacity costs shall be calculated with respect to peak demand, (Id.);

(4) Calculating forecast error support costs using more accurate methods than the "persistence" model, (Docket 40161, Direct Testimony of R. Thomas Beach, p. 34);

(5) Recognizing avoided capacity costs in advance of the first year in which capacity is needed, (Id. at p. 17);

(6) Calculating avoided transmission costs using the FERC authorized long-term firm transmission rate, (Id. at p. 24);

(7) Calculating avoided distribution costs using the method recommended by GIPL/Southface, (Id. at p. 27);

(8) Calculating REC values based using the method recommended by GIPL/Southface, (Id. at p. 28;

(9) Calculating fuel hedging benefits using the method recommended by GIPL/Southface (Id. at p. 17), and;

(10) Identifying generation ramp, bottom out and reliability/resiliency benefits as placeholder components, (Tr. 2727; Direct Testimony of Staff Witness Panel, p. 56, and; Direct Testimony of R. Thomas Beach, p. 31).

Additionally, the impact of widely dispersed and technologically diverse facilities on the overall cost/benefit analysis was identified as a potentially missing component. (Docket 40161, Direct Testimony of John D. Wilson, p. 27) The Company's rebuttal of these recommendations is unpersuasive, as the technical justifications for each of these recommendations are effectively presented in testimony.

An example of the unpersuasive rebuttal is the Company's objection to simplifying the Framework by consolidating four components into two. (Id. at p. 42) The Company did not

rebut the point that implementing the recommendation would have zero net impact on the results when the Company applies the Framework, or that it is merely a simplification. The Company overlooked the fact that this simplification could partially address the concern raised by the Staff witness panel, that "several elements of the Framework are adjustments due to modeling limitations. These elements exist because the Company's resource planning modeling does not currently integrate renewable energy options into the resource planning modeling." (Docket 40161, Direct Testimony of Barber, Spellman, Peaco and Kaduk, pp. 44 and 46)

The Company's rebuttal to simplifying the Framework is that without the more complex details, "you're not able to identify what the issue is." (Tr. 2066) However, the Witness Panel did not identify any reason that these multiple steps could not be calculated in a single step – which supports the point made by Mr. Wilson that these multiple steps measure one thing: avoided cost. The avoided cost of capacity in the base plan plus the "generation remix" is simply the avoided cost of a plan with additional renewable energy; when integrated together, as encouraged by Staff (Docket 40161, Direct Testimony of Barber, Spellman, Peaco and Kaduk, p. 54), the combination partially remedies the Company's failure to integrate renewable energy options into resource planning models. Breaking avoided cost into multiple components labeled to highlight certain technical arguments is unnecessary; the simpler method will more clearly identify the impact of renewable energy from an avoided cost perspective and more closely aligns with precedent in the application of PURPA qualified facility tariffs.

Furthermore, a technically unsound RCB Framework could upend standing precedent. For example, the Company also objected to SACE's recommendation to calculate support capacity costs with respect to peak demand. (Docket 40161, Georgia Power Rebuttal Testimony, p. 17) In its rebuttal, the Company cited two factors that should not be ignored. One factor was "production cost impacts," which are not at issue in "capacity costs." SACE's witness

specifically stated that the Company's methods in this respect were "reasonable." (Direct Testimony of John Wilson, p. 35) The mention of "production cost impacts" is a red herring. The other factor cited by the Company is "reliability impacts." The Company's position that it can reasonably establish a need for capacity based "hours other than just the peak hours" is without precedent, and is at odds with the Company's entire case for increasing its reserve margin in this proceeding.

A third policy issue raised by the Company's rebuttal is vagueness, which could give the Company excessive latitude in quantifying key aspects of its RCB Framework. For example, the Company failed to explain how the calculation of the Incremental Capacity Equivalent ("ICE") will be performed in specific instances. According to the Solar Analysis, the ideal method could not be used to calculate the ICE "in the time frame associated with this study," and a simplified method was used. (Solar Analysis, p. 12) Even though this "ideal method" was never clearly described in testimony, the Company witness panel testified that the method is "consistent with how we do every other calculation." (Tr. 2064) The Company's witness panel explained that the Framework is needed to reflect "a quantitative viewpoint" for renewables and "quantify some of those things" that for "traditional resources" the Company has considered using a "qualitative analysis." (Tr. 218)

SACE agrees that the Framework is a step forward in making quantitative what was once qualitative, but the Company's application of this principle is inconsistent. For example, the Company's testimony sidesteps legitimate issues, such as how the Company reasonably concluded that, "all new proposed solar resources should be evaluated in light of all previously committed solar projects so that the declining value of solar generation can be appropriately measured." (Solar Analysis, p. 25) But while this "declining value" is recommended for quantification by the Company, it declined to acknowledge and quantify the increased benefit

that would result from considering the "correlation between what actual solar output is on the actual days of peak demand." (Direct Testimony of R. Thomas Beach, p. 21) To ensure that a "quantitative viewpoint is adopted," the ICE method should be specified so that issues, such as those raised by GIPL/Southface, can be identified and addressed.

The Company was also vague with respect to when and on what basis it would perform the ICE calculation. Although its witness panel indicated that the ICE will be calculated on a project-specific basis for the REDI Program (Tr. 2063), the Company did not clearly identify whether it would calculated one or more generic ICE values for purposes such as the PURPA tariff. The practicality of this is questionable, as the Company was not able to use the "ideal method" for the solar analysis "in the time frame associated with the study," as discussed above. Furthermore, because the ICE can be affected by changes to the system, the final RCB Framework should provide for the appropriate recalculation of each generic ICE to occur periodically in the context of tariffs and other non-project specific applications of the Framework.

These three examples indicate that the Company's arguments to reject intervenor concerns with the RCB Framework are not merely technical flaws, but potentially precedential changes to the Company's longstanding positions with respect to matters as significant as the basic concept of avoided costs, the basis for establishing a need for capacity, the measurement of capacity and the schedule for updating key inputs into tariffs and other non-project specific applications of the RCB Framework.

II. The Commission Should Deny the Company's Request for Approximately $300 Million in Expenses and Financing Costs for Evaluation of a Possible New Nuclear Development Site in Stewart County Until 2019 When Vogtle Unit 3 Is Estimated To Be Complete and the Actual Cost of New Nuclear Construction Will Be Known; Development of New Nuclear Reactors in Stewart County Will Not take 17 Years As the Company Claims So That Delaying Any Consideration of New Nuclear Units Until the 2019 IRP Case Will Not Have a Detrimental Impact On Completing the Potential New Nuclear Reactors

SACE supports the PSC Advocacy Staff's recommendation not to approve the Company's request to spend $175 million to investigate and license new nuclear generation units in Stewart County because the actual cost of this request is over $300 million and the cost of Vogtle Units 3 and 4 should be taken into account when considering the development of new nuclear units. The Commission can reconsider the Company's request in the 2019 IRP proceeding when Vogtle Unit 3 will be complete based on the Company's current commercial operation date that has been reaffirmed in its prudency review filing, and the final cost of Vogtle Units 3 and 4 will be ascertainable and can be used for economic comparisons to other generation options.

At the June 7th rebuttal hearing Georgia Power confirmed that in addition to the $175 million there would be additional costs of debt and equity financing that would be added to the $175 million amount. (Tr. 2076) In a response filed by the Public Interest Advocacy Staff to Georgia Power Company's Response to Hearing Request HR-2-2 the PSC Staff confirmed that the grossed up financing costs would be higher than the $131 million to $153 million range originally used by the Advocacy Staff in their illustrative exhibit that was marked for identification as Staff Exhibit 48. (Docket Nos. 40161 & 40162, Public Interest Advocacy Staff's Reply to Georgia Power Company's Response to HR-2-2) Using Staff's calculations of the financing costs means that the actual cost to ratepayers of approving the investigative and

licensing costs of new nuclear generation units is higher than the range of $306 million to $328 million.

Lack of Commission approval of the investigative and licensing costs has not prevented the Company from moving forward with their preparation and review for new nuclear generation. In fact they have already spent approximately $30.1 million on those activities. (Dockets 40161 & 40162, Georgia Power Company's Response to STF-21-1) In its response to STF-21-1(a) the Company stated, "[t]he Company has recorded approximately $14.0M and $16.1M of Preliminary Surveys and Investigation ("PS&I") costs for the new nuclear generation option through December 31, 2015 and March 31, 2016, respectively." (Id.) The Company may include a reimbursement request for its investigative and licensing costs in their 2019 IRP filing.

Waiting until the 2019 IRP before deciding to approve costs to investigate and license new nuclear generation will allow the Commission to know the final cost of Unit 3. The Staff stated that, "[t]he actual cost and output of Vogtle 3 and 4 should be taken into account when considering new nuclear units . . ." (Docket 40161, Direct Testimony of Newsome and Hayet, p. 53) Having this cost information will assist the Commission in its analysis of whether new nuclear generation is cost competitive in comparison to other generation options, and will allow the Commission the opportunity to compare the Company's estimate of $14 billion (Tr. 2083) for two new Toshiba-Westinghouse AP1000 reactors to the actual cost of Vogtle Units 3 and 4.

Furthermore, the development of new nuclear reactors in Stewart County should not take 17 years as the company claims so that delaying any consideration of new nuclear reactors until the 2019 IRP case will not have a detrimental impact on completing the potential new nuclear reactors when they might be needed in mid-2030s.

The Company is overestimating the length of time it will take to develop two new nuclear

units based on Vogtle Units 3 and 4. The Company started its construction and operating license ("COL") application for Vogtle Units 3 and 4 in June 2006, and submitted its COL application on March 31, 2008. (Tr. 2078) On February 10, 2012, almost four years after its COL was submitted, the Company received approval of its COL. (Tr. 2079) Based on the Company's 17 year estimate for new nuclear generation development and the Vogtle Units 3 and 4 COL development beginning in June 2006, that would mean the Vogtle Units 3 and 4 would not be completed until 2023 and 2024 respectively (Tr. 2080), although their current commercial operation dates are June 2019 and June 2020. Based on the Company's experience building Vogtle Units 3 and 4 it is not logical to assume that it would take longer to develop 2 new AP1000 Units, rather it is more reasonable to assume the Company could build two new AP1000 units in less time than it took to build the Vogtle Units.

The February 2021 expiration of the Design Control Document ("DCD") for the Westinghouse AP 1000 reactor design is not a concern.[1] Westinghouse intends to submit a renewal to the NRC for the DCD and can do so as early as 2018.[2] As stated by Company witness Chiock, "We don't have any reason to believe that they would be late in recertifying the

[1] A DCD is valid for 15 years if not renewed per Appendix D to 10 CFR Part 52 – Design Certification Rule for the AP1000 Design: "This appendix may be referenced for a period of 15 years from February 27, 2006, except as provided for in 10 CFR 52.55(b) and 52.57(b). this appendix remains valid for an applicant or licensee who references this appendix until the application is withdrawn or the license expires, including any period of extended operation under a renewed license." http://www.nrc.gov/reading-rm/doc-collections/cfr/part052/part052-appd.html

[2] 10 CFR Part 52.57 Application for renewal:
"(a) Not less than 12 nor more than 36 months before the expiration of the initial 15-year period, or any later renewal period, any person may apply for renewal of the certification. An application for renewal must contain all information necessary to bring up to date the information and data contained in the previous application. The Commission will require, before renewal of certification, that information normally contained in certain procurement specifications and construction and installation specifications be completed and available for audit if this information is necessary for the Commission to make its safety determination. Notice and comment procedures must be used for a rulemaking proceeding on the application for renewal. The Commission, in its discretion, may require the use of additional procedures in individual renewal proceedings.
(b) A design certification, either original or renewed, for which a timely application for renewal has been filed remains in effect until the Commission has determined whether to renew the certification. If the certification is not renewed, it continues to be valid in certain proceedings, in accordance with the provisions of §52.55.
(c) The Commission shall refer a copy of the application for renewal to the Advisory Committee on Reactor Safeguards (ACRS). The ACRS shall report on those portions of the application which concern safety and shall apply the criteria set forth in §52.59."
[72 FR 49529, Aug. 28, 2007] http://www.nrc.gov/reading-rm/doc-collections/cfr/part052/parto52-0057.html

design, or early in recertifying the design." (Tr. 2084) Further, according to NRC rules and regulations, a standard design certification continues to be valid in any proceeding on an application for a combined license that references the design certification and is docketed before the date of expiration of the certification.[3] Consequently, a Commission decision to delay consideration of new nuclear generation at the Stewart County site until the 2019 IRP case will not have a detrimental impact.

According to the Staff's analysis it will "be nearly 20 years before new nuclear would be needed." (Tr. 747; Docket 40161, Direct Testimony of Newsome and Hayet, p. 52) Waiting until 2019 before considering the need for new nuclear units will not create a scheduling problem for the development of new nuclear generation, and the Company has already begun to move forward with its investigative and licensing activities according to their response to STF-21-1. (Docket 40161 & 40162, Georgia Power Company's Response to STF-21-1)

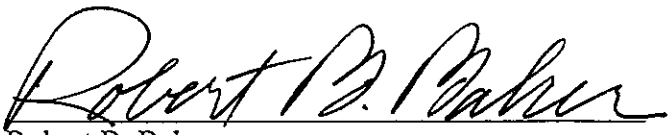
[3] 10 CFR Part 52.55 Duration of Certification:
"(a) Except as provided in paragraph (b) of this section, a standard design certification issued under this subpart is valid for 15 years from the date of issuance.
(b) A standard design certification continues to be valid beyond the date of expiration in any proceeding on an application for a combined license or an operating license that references the standard design certification and is docketed either before the date of expiration of the certification, or, if a timely application for renewal of the certification has been filed, before the Commission has determined whether to renew the certification. A design certification also continue to be valid beyond the date of expiration in any hearing held under §52.103 before operation begins under a combined license that references the design certification.
(c) An applicant for a construction permit or a combined license may, at its own risk, reference in its application a design for which a design certification application has been docketed but not granted." [72 FR 49529, Aug. 28, 2007] http://www.nrc.gov/reading-rm/doc-collections/cfr/part052/part052-0055.html

III. Conclusion

WHEREFORE, based on the foregoing evidence and arguments the Southern Alliance for Clean Energy respectfully requests that the Commission adopt its recommendations in both Dockets 40161 and 40162 as follows:

1. Increase the REDI Program to 2,000 MWs with selection of wind PPAs capped at 500 MWs of the 2,000 MWs.
2. Revise the procurement schedule for the REDI Program to maximize cost-effectiveness.
3. Provide more specific direction and inclusion of intervenors in the resolution of issues related to the Renewable Cost Benefit Framework.
4. Deny the Company's request for any cost recovery of expenses associated with new nuclear licensing and development until Vogtle Unit 3 is completed and operational.

Respectfully submitted this 29th day of June, 2016.



Robert B. Baker
Attorney for SACE

Freeman Mathis & Gary, LLP
100 Galleria Parkway, Suite 1600
Atlanta, Georgia 30339
770-818-4240 (Office)
bbaker@fmglaw.com

BEFORE THE
GEORGIA PUBLIC SERVICE COMMISSION
STATE OF GEORGIA

Georgia Power Company's 2016 Integrated Resource Plan and Application for Decertification of Plant Mitchell Units 3, 4A and 4B, Plant Kraft Unit 1 CT, and Intercession City CT	]	Docket No. 40161
And	]	
Georgia Power Company's Application for the Certification, Decertification, and Amended Demand Side Management Plan	]	Docket No. 40162

CERTIFICATE OF SERVICE

I hereby certify that the foregoing the **Post-Hearing Brief of the Southern Alliance for Clean Energy, Inc.** was filed in Dockets 40161 and 40162 with the Georgia Public Service Commission's Executive Secretary by hand delivery. An electronic copy of same was served upon all parties listed below by electronic mail, unless otherwise indicated, and addressed as follows:

Reece McAlister
Executive Director
Georgia Public Service Commission
244 Washington Street, S.W.
Atlanta, Georgia 30334

Jeffrey Stair, Esq.
Georgia Public Service Commission
jeffreys@psc.state.ga.us

Kevin Greene, Esq.
Brandon Marzo, Esq.
Steven Hewitson, Esq.
Jack E. Jirak, Esq.
Troutman Sanders LLP
Kevin.Greene@troutmansanders.com
Brandon.Marzo@troutmansanders.com
Steven.Hewitson@troutmansanders.com
Jack.Jirak@troutmansanders.com

Anne Blair
Southern Alliance for Clean Energy, Inc.
Anne@cleanenergy.org

Kurt D. Ebersbach, Esq.
Katie C. Ottenweller, Esq.
Southern Environmental Law Center
kebersbach@green-law.org
kottenweller@green-law.org

Randall D. Quintrell
Georgia Mining Association
Randy.quintrell@sutherland.com

Jeffry Pollock
J. Pollock Incorporated
jcp@jpollockinc.com

Jim Clarkson
Resource Supply Management
jclarkson@rsmenergy.com

Zachary M. Fabish, Esq.
The Sierra Club
Zachary.fabish@sierraclub.org

Bruce Burcat, Esq.
Mid-Atlantic Renewable Energy Coalition
Southern Wind Energy Association
Marec.org@gmail.com

Newton M. Galloway, Esq.
Terri M. Lyndall, Esq.
Galloway & Lyndall, LLP
ngalloway@gallyn-law.com
tlyndall@gallyn-law.com

Mark Baxter, Esq.
Thomas T. McClendon, Esq.
Stone & Baxter, LLP
mbaxter@stoneandbaxter.com
tmcclendon@stoneandbaxter.com

William Bradley Carver, Esq.
Georgia Large Scale Solar Association
bcarver@hallboothsmith.com

Cary Kottler, Esq.
Clean Line Energy Partners, LLC
ckottler@cleanlineenergy.com

Charles B. Jones, III
Georgia Association of Manufacturers
cjones@gtma.org

Liz Coyle
Georgia Watch
lcoyle@georgiawatch.org

Alan R. Jenkins, Esq.
Jenkins at Law, LLC
The Commercial Group
AJ@jenkinsatlaw.com

Robert Jackson, Esq.
Greenlaw, Inc.
rjackson@greenlaw.org

Anne W. Lewis, Esq.
Frank B. Strickland, Esq.
Strickland Brockington Lewis, LLP
awl@sbllaw.net
fbs@sbllaw.net

Joshua L. Belcher, Esq.
Sutherland, Asbill & Brennan, LLP
Joshua.belcher@sutherland.com

Robert Weaver, Esq.
Georgia State Building and Construction Trades
rweaver@qcwdr.com

This 29th day of June, 2016.

Robert B. Baker
Attorney for SACE

Freeman Mathis & Gary, LLP
100 Galleria Parkway, Suite 1600
Atlanta, Georgia 30339
770-818-4240 (Office)
bbaker@fmglaw.com