

**STATE OF GEORGIA**  
**BEFORE THE**  
**GEORGIA PUBLIC SERVICE COMMISSION**

**In Re:** )  
**Georgia Power Company's** )  
**Application for the Certification of** )  
**the 2029–2031 All-Source Capacity** )  
**RFP and Georgia Power Company's** ) **Docket Nos. 56298 & 56310**  
**Application for the Certification of** )  
**Supplemental Resources for 2028–** )  
**2031 Capacity** )  
 )

**DIRECT TESTIMONY OF LUCY METZ**

**ON BEHALF OF**

**THE SIERRA CLUB AND THE SOUTHERN ALLIANCE FOR CLEAN ENERGY**

**(PUBLIC VERSION)**

**November 12, 2025**



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**1. INTRODUCTION AND PURPOSE OF TESTIMONY**

1     **Q     Please state your name and occupation.**

2     **A**My name is Lucy Metz. I am a Senior Associate at Synapse Energy Economics,  
3             Inc. (Synapse). My business address is 485 Massachusetts Avenue, Suite 3,  
4             Cambridge, Massachusetts 02139.

5     **Q     Please describe Synapse Energy Economics.**

6     **A**Synapse is a research and consulting firm specializing in energy and  
7             environmental issues, including electric generation; transmission and distribution  
8             system reliability; ratemaking and rate design; electric industry restructuring and  
9             market power; electricity market prices; stranded costs; efficiency; renewable  
10            energy; future of gas utilities planning; environmental quality; and nuclear power.

11           Synapse's clients include state consumer advocates, public utilities commission  
12           staff, attorneys general, environmental organizations, federal government  
13           agencies, and utilities.

14    **Q     Please summarize your work experience and educational background.**

15    **A**At Synapse, I conduct analysis and write publications on a variety of topics  
16            related to power plant economics and integrated resource planning. I regularly  
17            support the development of comments and testimony in litigated dockets across  
18            the country, including performing analyses of electric power systems using  
19            industry-standard models such as EnCompass and spreadsheet tools. I recently  
20            sponsored testimony before the public service commissions of Kansas, North  
21            Carolina, and Wisconsin, and I co-sponsored testimony before the Georgia Public  
22            Service Commission in 2024.



1 I hold a Bachelor of Science in Engineering Science from Smith College. A copy  
2 of my current resume is attached as Exhibit LM-1.

3 **Q On whose behalf are you testifying in this case?**

4 **A** I am testifying on behalf of the Sierra Club and the Southern Alliance for Clean  
5 Energy (SACE).

6 **Q Have you previously testified before the Georgia Public Service Commission**  
7 **(Commission)?**

8 **A** Yes, I co-sponsored testimony before the Commission in Docket No. 55378,  
9 Georgia Power's 2023 Integrated Resource Plan (IRP) Update.

10 **Q What is the purpose of your testimony in this proceeding?**

11 **A** In my testimony for this proceeding, I evaluate whether Georgia Power Company  
12 ("Georgia Power" or "Company") has established that the full quantity of  
13 proposed resource additions is needed. In particular, I evaluate whether all of the  
14 proposed resource additions are needed to serve customers with firm  
15 commitments to receive electric service from Georgia Power. Next, I assess how  
16 resource costs have changed since Georgia Power completed its 2025 IRP and  
17 evaluate whether the Company adequately compared the proposed resources to  
18 alternatives. Finally, I discuss potential ratepayer impacts of the proposed  
19 capacity additions. I suggest actions the Commission could take to minimize the  
20 cost of serving prospective large-load customers and protect existing ratepayers  
21 from future rate increases related to large-load customer additions.



1     **Q     How is your testimony structured?**

2     **A     In Section 2, I summarize my findings and recommendations for the Commission.**

3             In Section 3, I describe Georgia Power's requests in this docket related to  
4             obtaining Certificates of Public Convenience and Necessity (CPCN) for the  
5             proposed resources obtained through the initial Request for Proposals (RFP), as  
6             well as the supplemental resources.

7             In Section 4, I demonstrate the extent to which large-load customers are driving  
8             Georgia Power's need for the proposed resources. I explain the risks of procuring  
9             capacity for prospective large-load customers before these customers have made a  
10            firm commitment to receive service through executed contracts for electric  
11            service.

12            In Section 5, I evaluate changes in resource costs since the Company completed  
13            its 2025 IRP and discuss the cost-effectiveness of the combined-cycle (CC) gas-  
14            fired units relative to alternatives. I describe how reducing the quantity of  
15            resource procurements to match signed customer contracts would allow Georgia  
16            Power to remove the most expensive and risky resources from its proposed  
17            portfolio.

18            In Section 6, I recommend measures that Georgia Power could take to minimize  
19            price increases associated with large-load additions and protect its existing  
20            ratepayers from cost-shifting associated with prospective large-load customers.



1     **Q**     **What documents do you rely upon for your analysis, findings, and**  
2             **observations?**

3     **A**     My analysis relies primarily upon the workpapers, exhibits, and discovery  
4             responses provided by the Company, as well as publicly available data.

5     **Q**     **Are you sponsoring any exhibits for your testimony?**

6     **A**     Yes, I am sponsoring 31 exhibits listed in Table 1.

**Table 1: List of Exhibits**

<b>Exhibit</b>	<b>Name</b>	<b>Confidentiality</b>
LM-1	Resume of Lucy Metz	Public
LM-2	Company response to Staff discovery request STF-PIA-4-3	Public
LM-3	Company response to Staff discovery request STF-PIA-1-9	Public
LM-4	Company response to Staff discovery request STF-PIA-7-1	Trade Secret
LM-5	Company response to Staff discovery request STF-PIA-15-1	Trade Secret
LM-6	Company response to Staff discovery request STF-PIA-9-12	Public
LM-6A	Company response to Staff discovery request STF-PIA-8-7	Public
LM-7	Company response to Staff discovery request STF-PIA-9-18	Public
LM-8	Company response to Staff discovery request STF-PIA-15-4	Public
LM-9	Company response to Staff discovery request STF-PIA-17-14	Public
LM-10	Company response to Staff discovery request STF-PIA-9-3	Public
LM-11	Company response to Staff discovery request STF-PIA-5-19	Public
LM-12	Company response to Staff discovery request STF-PIA-8-8	Public
LM-13	Company response to Staff discovery request STF-PIA-15-6	Trade Secret



LM-14	Company response to Staff discovery request STF-PIA-8-5	Public
LM-15	Company Request for Proposal - Gas Forecast Bid Summary	Trade Secret
LM-16	Company response to Staff discovery request STF-PIA-1-2	Trade Secret
LM-17	Company response to Staff discovery request STF-PIA-3-4	Public
LM-18	Company response to Staff discovery request STF-PIA-3-1	Trade Secret
LM-18A	Company response to Staff discovery request STF-PIA-15-3	Public
LM-19	Company response to Staff discovery request STF-PIA-1-3	Trade Secret
LM-20	Company response to Staff discovery request STF-PIA-3-37	Public
LM-21	Company response to Staff discovery request STF-PIA-8-2	Public
LM-22	Company response to Staff discovery request STF-PIA-3-5	Public
LM-23	Company response to Staff discovery request STF-PIA-8-4	Public
LM-24	Company response to Staff discovery request STF-PIA-8-11	Public
LM-25	Company response to Staff discovery request STF-PIA-3-35	Public
LM-26	Company response to Staff discovery request STF-PIA-1-18	Public
LM-27	Company response to Staff discovery request STF-PIA-6-3	Public
LM-28	Company response to Staff discovery request STF-PIA-6-4	Public
LM-29	Company response to Staff discovery request STF-PIA-3-33	Public

## 2. FINDINGS AND RECOMMENDATIONS

1    **Q**     Please summarize your findings.

2    **A**     My primary findings are the following:



1. Georgia Power is requesting approval for 9.9 gigawatts (GW) of new capacity that it projects will come online between 2027 and 2030. In the absence of load growth from large-load customers, the Company would not have a capacity need until [REDACTED]. This suggests that, but for these new customers, Georgia Power would not need the proposed RFP and supplemental resources on the current timeline.
2. Demand from new customers for capacity on an accelerated timeline will increase costs and risks to all ratepayers, absent action from the Commission to protect existing ratepayers.
3. Georgia Power plans to procure enough capacity to serve the entire amount of demand from large-load customers that it included in its B2026 resource planning forecast through 2031 ([REDACTED]). Only part of this demand (6.2 GW) is from customers with signed contracts for electric service.
4. The capital costs of CC plants have more than doubled since Georgia Power completed its 2025 IRP. Building the Wansley, Bowen, and McIntosh CC units now will lock ratepayers into the current high cost of these assets, as well as the cost of firm gas transport, for decades to come.
5. The costs of McIntosh are particularly high at [REDACTED] per kilowatt (kW) (excluding AFUDC<sup>1</sup>). This is the highest cost I have seen for a CC plant in the United States. Firm gas transport and storage costs will add [REDACTED] in fixed costs each year over the plant's 45-year lifetime, in addition to the cost of the fuel itself.
6. Georgia Power's decision to bid only CC and no combustion-turbine (CT) units into the RFP was not based on robust analysis under current market conditions. The Company has not demonstrated that the proposed CC

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<sup>1</sup> AFUDC refers to allowance for funds used during construction.



- 1 units are more cost-effective than an alternative portfolio of, for example,  
2 solar and CTs at current resource prices.
- 3 7. Battery storage resources can provide ratepayers with a variety of benefits  
4 based on their size, flexibility, and shorter lifetime (relative to fossil  
5 resources). Investment in battery storage, alone or in conjunction with  
6 wind and solar, can help mitigate the risks of being locked into a long-  
7 term asset, as well as the fuel-price volatility risks posed by investment in  
8 gas CCs.
- 9 8. Investing in generation assets to serve a large quantity of large-load  
10 additions without also incorporating strategies such as customer flexibility  
11 and behind-the-meter generation will drive up system costs and put  
12 existing ratepayers at risk.

13 **Q Please summarize your recommendations.**

14 **A** Based on my findings, I offer the following recommendations:

- 15 1. The Commission should allow Georgia Power to procure resources only  
16 up to the amount needed to serve large-load customers with signed  
17 contracts for service. This constraint would reduce the size of the  
18 Company's capacity need in 2031 from 8.9 GW to [REDACTED] in winter and  
19 7.7 GW to [REDACTED] in summer.
- 20 2. Commission approval of any resources above this amount should be  
21 contingent on Georgia Power obtaining signed contracts for service from a  
22 corresponding amount of large-load customers.
- 23 3. Georgia Power should remove McIntosh Unit 12 from its portfolio of  
24 proposed resources, given the unit's high capital costs and high fixed fuel  
25 costs. This unit is not needed to serve customers with signed contracts.



- 1           4. Before approving CPCNs for any of the CC units, the Commission should  
2           instruct Georgia Power to evaluate the cost-effectiveness of the proposed  
3           CCs compared to an alternative portfolio of CTs or additional battery  
4           storage paired with solar under current market conditions.
- 5           5. Georgia Power should focus its near-term procurement on no-regrets  
6           solutions that its ranking analysis found to be cost-effective, such as the  
7           proposed battery storage projects from the RFP and supplemental  
8           resources.
- 9           6. Georgia Power should pursue customer demand flexibility, distributed  
10          energy resources, and other strategies to reduce the cost of serving large-  
11          load customers. The Company should incorporate the impact of these  
12          strategies into its resource planning and procurement processes.
- 13          7. While the revisions to the Company's Rules and Regulations for Electric  
14          Service represent a first step towards protecting existing ratepayers from  
15          the risks of large-load growth, Georgia Power should increase the  
16          transparency around large-load customer contracts and establish tariffs  
17          that commit large-load customers to paying their full incremental cost of  
18          service.

19   **3. SUMMARY OF THE COMPANY'S PROPOSAL**

20   **Q       What is Georgia Power requesting in this docket?**

21   **A**Georgia Power is requesting approval to procure 9.9 GW of nominal<sup>2</sup> capacity  
22           from resources that will come online between 2027 and 2030. This includes 3.7  
23           GW of company-owned CC facilities (TS Table 2); 3.4 GW of company-owned

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<sup>2</sup> Nominal capacity uses the summer rated capacity of thermal resources and the nameplate capacity of battery storage resources.



1 battery storage resources (TS Table 3); and 2.5 GW of power purchase agreement  
2 (PPA) resources (TS Table 4).

3 The PPA capacity includes 2.1 GW of gas resources, 0.6 GW (nameplate) of  
4 battery energy storage systems (BESS), and a 50-megawatt (MW) PPA with  
5 Mississippi Power Company. The PPA with Mississippi Power Company is the  
6 only agreement for which Georgia Power does not specify a resource type;  
7 instead, the Company states that this agreement is for “capacity in the Southern  
8 Company system pool and is not associated with specific capacity resources.”<sup>3</sup>

9 **TS Table 2. Company-owned thermal projects from All-Source RFP**

Unit Name	Summer Rated Capacity (MW)	Asset Life (years)	Commercial Operation Date	Capital Cost (million \$)
Bowen Units 7–8	1,482	45	Unit 7 - 11/1/2029 Unit 8 - 5/1/2030	
Wansley Units 10–11	1,453	45	Unit 10 - 11/1/2029 Unit 11 - 5/1/2030	
McIntosh Unit 12	757	45	11/1/2030	
<b>Total</b>	<b>3,691</b>	<b>-</b>	<b>-</b>	

10 *Source: All-Source RFP Certification Filing at 3-4 and 39. Dalton Utilities will own 1.5 percent of the*  
11 *capacity from Wansley Units 10–11 and will pay for a corresponding portion of the project’s capital and*  
12 *operating costs. The capacity and cost shown above are for Georgia Power’s portion of the facility only.*

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<sup>3</sup> Company response to STF-PIA-4-3.



1 TS Table 3. Company-owned battery storage projects and paired solar storage

Name	Nameplate Capacity (MW)	Summer Rated Capacity (MW)	Commercial Operation Date	Source	Capital Cost (million \$)
South Hall BESS	250	125	Nov 28	RFP	
Bowen Phase 1 BESS	250	250	Nov 28	RFP	
Bowen Phase 2 BESS	250	125	Nov 29	RFP	
Wansley BESS	500	500	Nov 28	RFP	
Thomson BESS	500	250	Nov 29	RFP	
Hammond Phase 2 BESS	192.5	96	Nov 30	RFP	
Yates 320 MW BESS	320	320	Nov 28	RFP	
Yates 250 MW BESS	250	137	Nov 28	RFP	
McIntosh BESS	250	125	Nov 30	RFP	
Laurens County BESS + Solar	200	100	Nov 28	RFP	
Plant Mitchell BESS + Solar	150	75	Nov 28	RFP	
Wadley BESS	260	143	Nov 27	Supplemental	
<b>Total</b>	<b>3,373</b>	<b>2,246</b>	<b>-</b>	<b>-</b>	

Sources: All-Source RFP Certification Filing at 3-4, 14, and 26; Supplemental Resources Certification Filing at 4 and 15; Company response to STF-PIA-1-9, "STF-PIA-1-9 Attachment.xlsx." All BESS resources have an asset life of 20 years. For paired solar and BESS resources, the nameplate capacity shown includes BESS only. Summer rated capacity includes the impacts of each resource's effective load-carrying capacity (ELCC).



1 **TS Table 4. PPAs from All-Source RFP and supplemental resources**

Name	Type	Summer Rated Capacity (MW)	Term (years)	Start date	Source	Year 1 Capacity Cost (\$/kW- year)
Sandersville	Combustion turbine	146	15	Nov-30	RFP	
Dahlberg 4	Combustion turbine	74	10	Jun-30	RFP	
Tenaska Heard County	Combustion turbines	930	20	Jun-30	Supplemental	
Mid-Georgia Cogen	Combined cycle	300	20	Jun-28	RFP	
Harris 1	Combined cycle	658	15	Jun-30	RFP	
NEER BESS (five agreements)	BESS	313	25	Nov-27	Supplemental	
MPC PPA amendment	None specified	50	1	Jan-29	Supplemental	
<b>Total</b>	-	<b>2,471</b>	-	-	-	-

2 *Sources: All-Source RFP Certification Filing at 2; Supplemental Resources Certification Filing at 4–5;*  
3 *Company response to STF-PIA-1-9, “STF-PIA-1-9 Attachment.xlsx”; TS Company response to STF-PIA-7-*  
4 *1, “STF-PIA-7-1 Attachment TRADE SECRET.xlsx.” The rated capacity shown for the NEER BESS PPAs*  
5 *includes the impacts of the ELCC. These resources have a nameplate capacity of 646 MW. The capacity*  
6 *cost shown for the NEER BESS PPAs is a capacity-weighted average of the cost of the five projects.*

7 **Q How did Georgia Power procure the 9.9 GW of resources for which it is**  
8 **seeking approval in this docket?**

9 **A** Georgia Power sourced 8.0 GW (nominal capacity) of proposed resources from  
10 the All-Source Capacity RFP for 2029–2031 that it issued in June 2024 (“RFP  
11 resources”). The remaining 1.9 GW of capacity are supplemental resources that  
12 the Company obtained from other sources (“supplemental resources”).

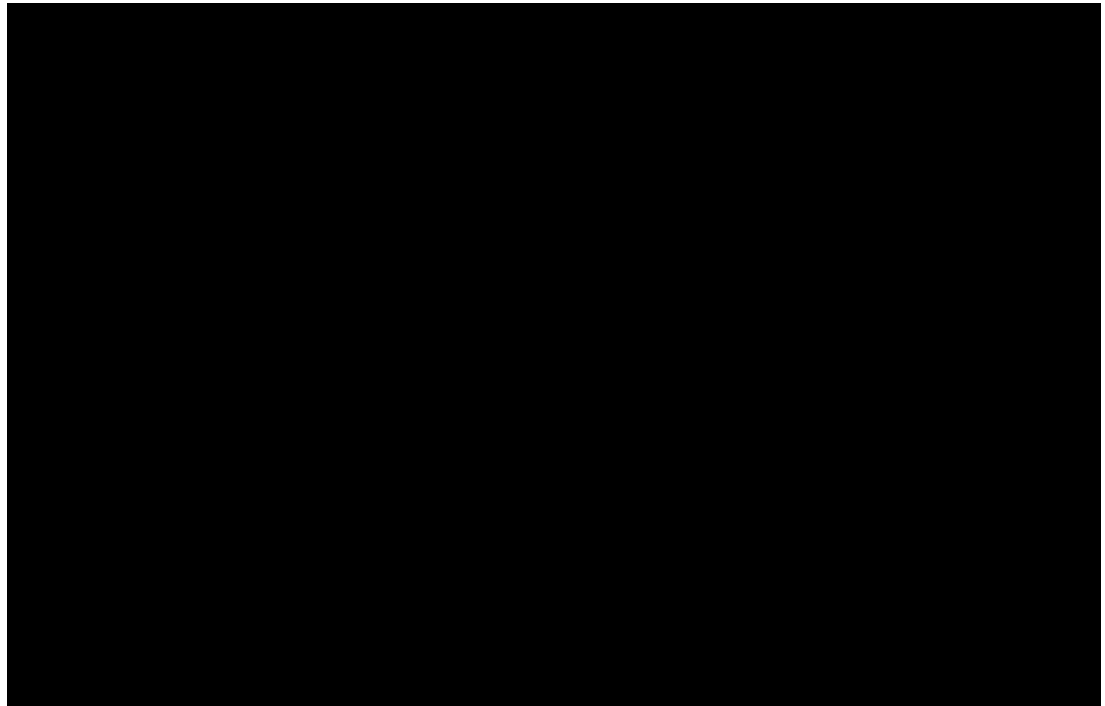


1     **Q     What is Georgia Power’s capacity position going forward?**

2     **A**TS Figure 1 shows Georgia Power’s winter capacity need and its existing  
3             resources. Without the proposed resources, the Company has a small capacity  
4             shortfall in both the summer and winter starting in 2028 that grows in subsequent  
5             years. By 2031, Georgia Power has a capacity shortfall of 8.9 GW in winter and  
6             7.7 GW in summer.

7             TS Figure 1 shows both Georgia Power’s total projected capacity need (solid line)  
8             and its capacity need excluding prospective large-load customers (dotted line).  
9             Without the large-load customer adjustment, Georgia Power does not have a  
10            capacity need in either summer or winter until [REDACTED].

11           **TS Figure 1. Georgia Power winter capacity position including existing resources**  
12           **only**



13           *Sources: Supplemental Load Filing, “Supplemental Resources Application Figures 3 4 Workpaper*  
14           *- Updated for B26 Load Forecast Testimony.xlsx” and Company response to STF-PIA-15-1,*  
15           *“STF-PIA-15-1 Attachment A TRADE SECRET.xlsx.”*  
16



1     **Q**     **What factors are driving Georgia Power’s near-term and long-term need for**  
2             **capacity?**

3     **A**     In the near term, Georgia Power’s capacity need is driven almost entirely by  
4             large-load customer growth, with a small amount attributed to the expiration of  
5             PPAs. Over the longer term, Georgia Power will need generation capacity to  
6             replace retiring legacy fossil units and serve increasing load across its existing  
7             customer base.

8             Looking at the near term, large-load customers account for 90 percent of the  
9             Company’s total projected load growth between 2029 and 2031,<sup>4</sup> and the  
10            Company projects those customers will contribute [REDACTED] to summer peak load  
11            by 2031.<sup>5</sup> In the absence of load growth from large-load customers, Georgia  
12            Power would not need any capacity additions until [REDACTED]. This suggests that the  
13            proposed resources in this docket would not be needed on the current timeline *but*  
14            *for* large-load additions. Expiration of existing PPA contracts contribute to  
15            Georgia Power’s near-term capacity need to a lesser extent; there are 3.3 GW of  
16            PPAs set to expire by 2030.<sup>6</sup>

17            For the long term, other factors that contribute to Georgia Power’s capacity need  
18            include growth in non-large-load customer segments (dotted line in TS Figure 1)  
19            and planned retirement of Georgia Power’s remaining coal and gas steam units in  
20            the mid- to late-2030s. Resource retirements are not a contributing factor to any of  
21            the resource requests in this docket.<sup>7</sup> Because the Company does not currently

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<sup>4</sup> Company response to STF-PIA-9-12.

<sup>5</sup> TS B2026 Load and Energy Forecast at 28.

<sup>6</sup> Company response to STF-PIA-9-12.

<sup>7</sup> Company response to STF-PIA-9-12.

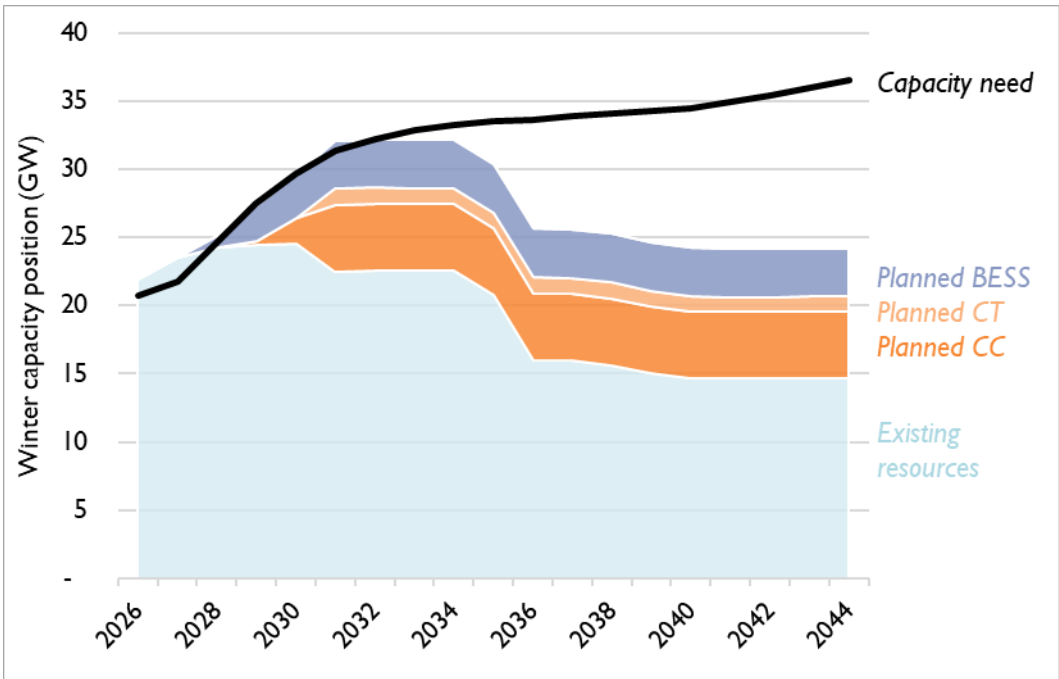


1 plan to retire its remaining coal units (Bowen Units 1–4, Scherer Units 1–3, and  
2 Wansley Units 1–2) until year-end 2035, there is enough lead time for the  
3 Company to procure alternate capacity sources to replace these legacy assets.

4 **Q How do the proposed RFP and supplemental resources contribute to meeting**  
5 **Georgia Power’s winter capacity need?**

6 **A** Figure 2 shows Georgia Power’s winter capacity position with the addition of the  
7 proposed RFP and supplemental resources. The proposed resources would resolve  
8 the Company’s summer and winter capacity need through 2031.

9 **Figure 2. Georgia Power winter capacity resources including proposed RFP and**  
10 **Supplemental resources**



11 Sources: Supplemental Load Filing, “Supplemental Resources Application Figures 3 4 Workpaper  
12 - Updated for B26 Load Forecast Testimony.xlsx.”  
13



1   **4. GEORGIA POWER IS PUTTING RATEPAYERS AT RISK BY PROPOSING TO SECURE**  
2   **RESOURCES FOR BOTH COMMITTED AND UNCOMMITTED LOAD**

3   **Q     Please summarize your concerns with Georgia Power’s current approach for**  
4   **determining the quantity of resources it will procure to serve large-load**  
5   **customers.**

6   **A**Like many U.S. utilities, Georgia Power is projecting a large amount of load  
7         growth from prospective large-load customers, primarily data centers. The  
8         Company now faces the challenge of appropriately translating its total pipeline of  
9         large-load customers into load growth forecasts that will guide its resource  
10        planning and resource procurement processes. If the Company builds too few new  
11        generating resources, it may forgo economic opportunities for the state. If it builds  
12        too many, it will leave existing ratepayers to foot the bill for unneeded resources.

13        Given the magnitude and pace of demand growth from prospective data center  
14        customers, it is necessary for utilities to distinguish between load forecasts used  
15        for long-term resource planning and short-term resource procurement. In this  
16        docket, Georgia Power is requesting to procure resources for the full amount of  
17        load in its resource planning forecast, even though only a fraction of this demand  
18        is backed by customers with signed contracts for electric service. As I explain in  
19        more detail below, this approach puts existing Georgia Power ratepayers at risk.  
20        Georgia Power should adjust its approach to procure only for customers with  
21        signed contracts.



1     **Q     How much demand is in Georgia Power’s pipeline of large-load customers?**

2     **A**TS Figure 3 shows Georgia Power’s projected pipeline of large-load customers.<sup>8</sup>  
3     The share of the large-load pipeline from data centers increases from 85 percent  
4     in 2026 to 93 percent by 2031, with manufacturing facilities and clean energy tech  
5     accounting for the remainder of the load.<sup>9</sup> Georgia Power categorizes prospective  
6     customers into three groups, based on each customer’s level of commitment. The  
7     categories are as follows:

- 8         •     Technical review: Customers in the Company’s internal review process who  
9             have not executed a request or contract for service. There does not appear to  
10            be any financial commitment associated with the technical review category.
- 11        •     Request for service: Customers who have executed a request for service but  
12             not a contract. To execute a request for service, customers must obtain site  
13             control and zoning permissions, complete intake documentation, and post  
14             initial performance security.<sup>10,11</sup>
- 15        •     Contract for service: Customers who have executed a contract for service,  
16             which commits them to financial obligations including minimum billing

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<sup>8</sup> Georgia Power defines large load customers as industrial customers larger than 45 MW and commercial customers larger than 115 MW. Project smaller than this are captured in the Company’s organic load forecast. See Company response to STF-PIA-8-7.

<sup>9</sup> PD Q2 2025 economic development report.

<sup>10</sup> The customers currently in the request for service category (as of Q2 2025) all executed their requests for service before Georgia Power established a requirement to post collateral at this stage. Therefore, these customers have even lower levels of financial commitment to Georgia Power than a customer executing a request for service today. See Company response to STF-PIA-9-18.

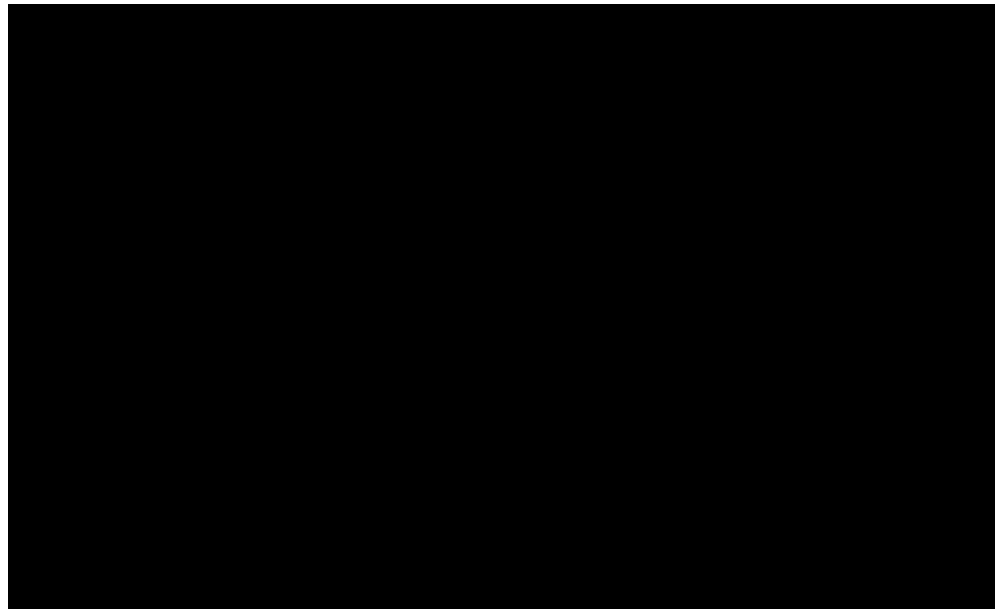
<sup>11</sup> Company response to STF-PIA-15-4.



1 requirements, electric service charges, and termination payments.<sup>12</sup> Customers  
2 must also post an increased performance security amount at this stage.<sup>13</sup>

3 Importantly, customers with signed contracts for service have made substantial  
4 long-term financial commitments to Georgia Power. Commitments from  
5 customers in the technical review and request for service categories are much  
6 more limited.

7  
8 **TS Figure 3. Large-load customer pipeline from Quarter 2 2025 Economic**  
9 **Development Report**



10  
11 *Source: TS B2026 forecast and PD Q2 2025 economic development report. The most recent data*  
12 *from Georgia Power shows that the Company now has 6.2 GW of contracted load by 2031*  
13 *(compared to the 4.4 GW shown above). Georgia Power did not provide an updated dataset*  
14 *showing this full amount of contracted load (see Company response to STF-PIA-17-14).*

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<sup>12</sup> Ibid.

<sup>13</sup> Ibid.



1     **Q**     **What is the likelihood that all load in the pipeline will ultimately materialize**  
2             **in Georgia Power’s service area?**

3     **A**     Georgia Power’s total pipeline of large-load customer growth includes over 55  
4             GW of prospective load by the early 2030s. This is more than triple the  
5             Company’s historical all-time peak load.<sup>14</sup> It is unlikely that the full amount of  
6             load in the pipeline will materialize in Georgia Power’s service area on that  
7             timeline. Figure 4 shows how the customer pipeline has changed over time. The  
8             highest growth since Georgia Power’s first quarterly filing at the beginning of  
9             2024 has been in the technical review category, which involves the lowest level of  
10            commitment from prospective customers.

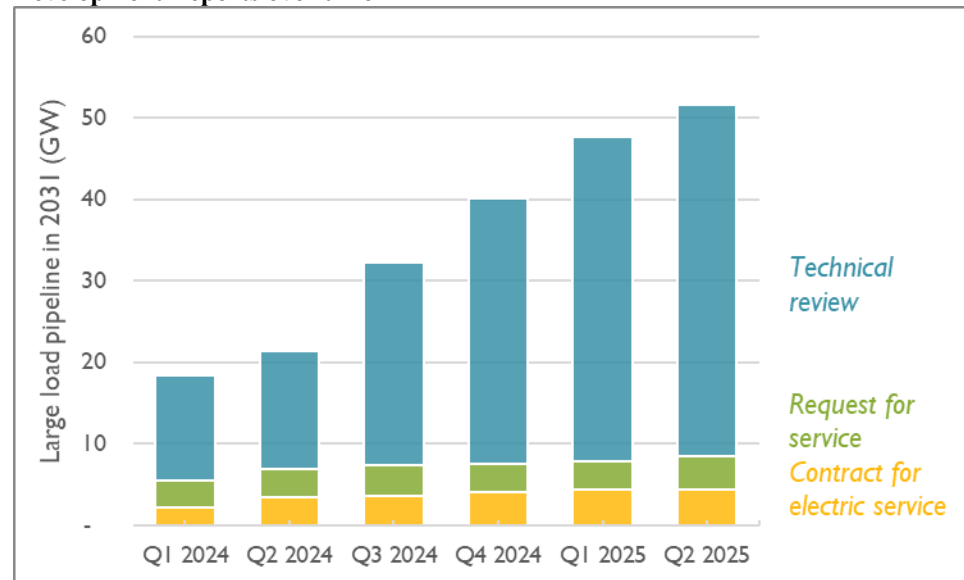
11           There are a variety of reasons that load in the pipeline may not ultimately  
12           materialize or may materialize more slowly than customers’ initial requests  
13           suggest. First, data center customers frequently engage in venue shopping,  
14           submitting interconnection requests in multiple utility service areas in search of  
15           the most competitive rates. As a result of venue shopping, not all project  
16           developers that succeed will choose Georgia as their location or Georgia Power as  
17           their service provider. Second, not all projects succeed financially, and even  
18           projects that eventually move forward may be delayed. Third, prospective  
19           customers may overestimate their peak load in their initial requests, since the lack  
20           of financial commitment at this stage gives them little incentive to forecast  
21           accurately.

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<sup>14</sup> The Company’s all-time peak load of 18.0 GW occurred in August 2007. See “Budget 2026 Load and Energy Forecast” at 4.



**Figure 4. Changes in near-term customer pipeline in Large-Load Economic Development Reports over time**



Sources: PD Large Load Economic Development Reports from Q1 2024 through Q2 2025.

**Q Are there industry examples that show how much speculative load will translate into utility customer load?**

**A** Yes, one recent example comes from AEP Ohio. After AEP Ohio established a large-load tariff that clearly stated the prices and terms to which prospective customers would need to commit—including minimum billing requirements—the amount of large load in its customer pipeline decreased by more than half, from 30 GW to 13 GW.<sup>15,16</sup> This illustrates that a large fraction of the load initially in the pipeline was from speculative customers who were unwilling to commit to tangible terms associated with receiving service from AEP Ohio. The increased

<sup>15</sup> “Application for Approval of New Tariffs by Ohio Power Company.” Public Utilities Commission of Ohio, Case No. 24-508-EL-ATA. May 13, 2024.

<sup>16</sup> “Status of Process for Signing Up New Schedule DCT [Data Center Tariff] Customers.” Public Utilities Commission of Ohio, Case No. 24-508-EL-ATA. September 11, 2025.



1 accuracy of the queue size is a good thing for AEP Ohio ratepayers. With a more  
2 accurate load forecast, AEP Ohio can more accurately assess its resource need  
3 and protect ratepayers from paying for unneeded assets.

4 **Q How does Georgia Power decide how much prospective large load to include**  
5 **in its resource planning forecast?**

6 **A** Georgia Power includes large load in its resource planning forecast as an external  
7 adjustment to the organic load forecast, which accounts for changes in load from  
8 traditional business and residential customers.<sup>17</sup> To develop the large-load  
9 adjustment, Georgia Power uses a probabilistic model called the Load Realization  
10 Model (LRM). The LRM models multiple dimensions of uncertainty for each  
11 project in the pipeline and performs a Monte Carlo simulation to capture the range  
12 of possible trajectories for large-load growth.<sup>18</sup> The Company uses the 50<sup>th</sup>  
13 percentile of 100,000 simulations as the large-load adjustment in its forecast.<sup>19</sup>

14 The accuracy of the LRM depends on the extent to which it captures the full range  
15 of uncertainty associated with prospective projects. For each project, the model  
16 represents three types of uncertainty: (1) project success or failure, (2) degree of  
17 load materialization, and (3) amount of project delay.<sup>20</sup> Project success or failure  
18 is a binary event that includes the probability that a given customer will select  
19 Georgia as its location; the probability that the customer will select Georgia  
20 Power as its electric service supplier; and the probability that the project remains

---

<sup>17</sup> PD B2026 Load and Energy Forecast at 4.

<sup>18</sup> Id at 26.

<sup>19</sup> Id at 27.

<sup>20</sup> Id at 21–26.



1 financially viable.<sup>21</sup> Degree of materialization is the percentage of load at the  
2 meter at full operation compared to the project's announced load. The LRM  
3 determines this based on a triangular distribution of possible outcomes.<sup>22</sup> Finally,  
4 project delay accounts for the risk that even projects that are eventually successful  
5 may come online later than initially projected.<sup>23</sup>

6 **Q What was the magnitude of the large-load customer adjustment in Georgia**  
7 **Power's most recent load forecast?**

8 **A** Georgia Power's most recent load forecast is the B2026 forecast, which it  
9 published in September 2025. The dotted line in TS Figure 3 shows the summer  
10 large-load peak adjustment that Georgia Power included in this forecast. By 2031,  
11 the large-load adjustment is [REDACTED],<sup>24</sup> of which only 6.2 GW have signed  
12 contracts for service in place.<sup>25</sup> (The winter large-load adjustment is smaller at [REDACTED]  
13 [REDACTED] by 2031.<sup>26</sup>)

14 **Q Should Georgia Power procure capacity to serve the full [REDACTED] of large**  
15 **load in its probabilistic forecast by 2031?**

16 **A** Not necessarily. While historically load forecasts for resource planning and  
17 procurement have been largely the same, the pace and magnitude of load growth

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<sup>21</sup> Ibid.

<sup>22</sup> Ibid.

<sup>23</sup> Ibid.

<sup>24</sup> TS B2026 Load and Energy Forecast at 28.

<sup>25</sup> Georgia Power Company Demonstrative Exhibit – Direct Hearing 10.21.25.

<sup>26</sup> TS Company response to STF-PIA-15-1, "STF-PIA-15-1 Attachment A TRADE SECRET.xlsx."



1 from prospective data center customers necessitates distinguishing between the  
2 two processes. A single large-load customer may add a gigawatt or more of load  
3 to the system, in contrast to historical load growth from residential and small  
4 industrial and commercial customers, which was more incremental.

5 The forecasts based on the probabilistic LRM results are intended to inform  
6 resource *planning* and other preliminary resource procurement activities.  
7 Resource *procurement* involves a higher level of financial commitment on  
8 Georgia Power's part, as well as a request from Georgia Power to recover costs  
9 from ratepayers. The Company should only procure resources for customers with  
10 signed contracts in place.

11 Importantly, my recommendation is not that Georgia Power should turn away  
12 potential business or create reliability risks. Rather, my recommendation is that  
13 the Company should right-size capacity additions to match the true pace of load  
14 materialization in Georgia. This strategy will enhance Georgia's competitiveness  
15 because it will minimize costs, increase transparency, and ensure resources are  
16 tailored to the current needs of prospective customers. Data centers that are  
17 serious about siting in Georgia will not be competing with phantom loads and will  
18 have more certainty about where they are in the queue.

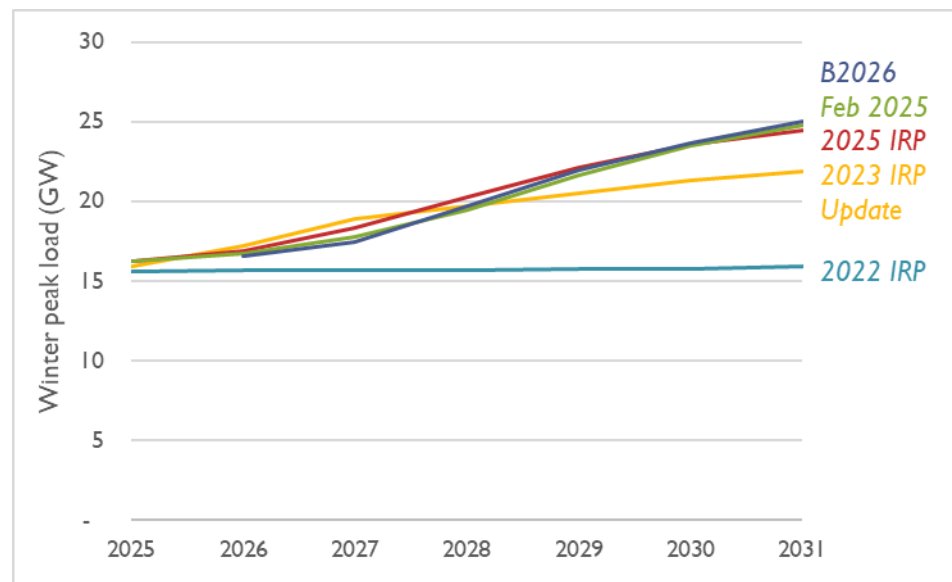
19 **Q Are there any indications that load is materializing more slowly than Georgia**  
20 **Power has been predicting in its resource planning load forecasts?**

21 **A** Yes, in the near term, Georgia Power's winter peak load has consistently  
22 decreased over the past three load forecasts (Figure 5), partially driven by updates  
23 that the Company made to its load forecasting methodology to better capture



project risk.<sup>27</sup> These near-term reductions suggest that load has been slower to materialize than Georgia Power initially expected. The Company confirmed that even since the February 2025 forecast, it “observed customers ramping up slower than expected.”<sup>28</sup> This underscores the risk of procuring resources to serve the full amount of large load in the probabilistic forecasts when not all demand from these customers is backed by a signed contract.

**Figure 5. Georgia Power projections of winter peak load since the 2022 IRP**



Sources: 2022 IRP forecast is from the Public Disclosure “Budget 2022 Load and Energy Forecast 2022 to 2041” at 18; 2023 IRP Update forecast is from the Public Disclosure “2023 IRP Update Load and Energy Forecast” at 12; 2025 IRP forecast is from the Public Disclosure “Budget 2025 Load and Energy Forecast 2025 to 2044” at 20; February 2025 forecast is from the “2029–2031 All-Source RFP Certification Application Needs Charts Workpaper.xlsx”; B2026

<sup>27</sup> Company response to STF-PIA-9-3.

<sup>28</sup> Company response to STF-PIA-5-19.



1 forecast is from the “Supplemental Resources Application Figures 3 4 Workpaper – Updated for  
2 B26 Load Forecast Testimony.xlsx.”

3 **Q If load eventually materializes, but at a slower rate than Georgia Power**  
4 **projected, does early procurement still pose risks to ratepayers?**

5 **A** Yes. Even if resources are eventually needed to serve load growth, procuring  
6 resources far in advance of when load materializes has three disadvantages. First,  
7 procuring resources before they are needed could result in Georgia Power locking  
8 in unnecessarily high resource costs. As I discuss in Section 4, resource capital  
9 costs, especially for gas resources, are currently higher than usual due to supply  
10 chain constraints, labor shortages, inflation, and tariff uncertainty.

11 Second, the time value of money means that it is financially beneficial for  
12 ratepayers if Georgia Power builds assets only as they are needed, rather than  
13 investing prematurely. This means Georgia Power and its ratepayers will have  
14 money available to spend on things they need in the near term.

15 Third, advances in artificial intelligence (AI) technologies and more sophisticated  
16 clean energy commitments from technology companies may change the amount  
17 of capacity and the types of resources that are best suited to serve new load.  
18 Companies such as Google and Emerald AI are exploring ways to make data  
19 center load more flexible, reducing the amount of capacity needed to serve each  
20 data center.<sup>29,30</sup> Some data centers are also pursuing 24/7 clean energy goals,

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<sup>29</sup> Skidmore, Z. 2025. “Nvidia to deploy Emerald AI’s orchestration software at 96MW Aurora data center in Manassas, Virginia.” *Data Center Dynamics*. October 30. Available at: <https://www.datacenterdynamics.com/en/news/nvidia-to-deploy-emerald-ai-orchestration-software-at-96mw-aurora-data-center-in-manassas-virginia/>.

<sup>30</sup> Wilson, R. “Google: Large Electric Load Additions Technical Conference.” Presentation at the North Carolina Utilities Commission Large Load Technical Conference, October 14, 2025. Docket No. E-100, Sub 208.



1 which will necessitate a supply of renewable energy and battery storage rather  
2 than fossil fuel resources.<sup>31</sup> Seven of Georgia Power’s prospective large-load  
3 customers have already expressed interest in procuring renewable energy to  
4 support their clean energy commitments, and more are likely to do so in the  
5 future.<sup>32</sup> By waiting to procure capacity until data centers are ready to commit  
6 with a signed contract, Georgia Power can tailor the resources it procures to the  
7 current needs of customers.

8 **Q Based on signed customer contracts, what amount of capacity should**  
9 **Georgia Power procure by 2031?**

10 **A** Adjusting the B2026 load forecast to include only large-load customers with  
11 executed contracts for service, Georgia Power’s winter capacity need will be  
12 reduced from 8.9 GW to [REDACTED] in winter 2031 and from 7.7 GW to [REDACTED] in  
13 summer 2031. Georgia Power could reduce the size of its proposed portfolio of  
14 resources by a corresponding amount. The current portfolio of RFP and  
15 supplemental resources has a total winter accredited capacity of 9.6 GW, of which  
16 only [REDACTED] is needed to serve contracted customers (a reduction of [REDACTED]).  
17 This falls within the range from the Commission’s order on Georgia Power’s  
18 2025 IRP, which authorized the Company to procure “at least 6,000 MW and UP  
19 to 8,500 MW” of capacity from the All-Source RFP.<sup>33</sup>

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<sup>31</sup> Ibid.

<sup>32</sup> Company response to STF-PIA-8-8.

<sup>33</sup> “Order Adopting Stipulation.” Georgia Public Service Commission, Docket Nos. 56002 and 56003. July 31, 2025.



1   **5. GEORGIA POWER HAS NOT DEMONSTRATED THAT THE COMBINED-CYCLE UNITS, IN**  
2       **PARTICULAR MCINTOSH UNIT 12, ARE THE MOST COST-EFFECTIVE RESOURCES TO**  
3       **SERVE SYSTEM NEEDS**

4       ***i. The capital costs of the proposed combined-cycle units have more than doubled***  
5       ***since Georgia Power completed its 2025 IRP and are among the highest I have***  
6       ***seen across the United States***

7   **Q     What trends have you seen in costs for new gas resources in recent utility**  
8       **filings?**

9   **A     Utilities across the country are currently facing increasing costs and lead times for**  
10       CC and CT units. Major contributors to this overall increase include rising costs  
11       for turbines, other key equipment (e.g., generator step-up transformers), and  
12       labor.<sup>34</sup> These increases are driven primarily by load growth from data centers,  
13       manufacturing facilities, and electrification, which together have caused surging  
14       demand from utilities for gas equipment, as well as global competition for  
15       turbines and other plant components.<sup>35</sup> Globally and domestically, increased  
16       demand has led to equipment backlogs and has increased the market power of the  
17       three major turbine manufacturers. Finally, the industry is experiencing a shortage

---

<sup>34</sup> GridLab, Energy Futures Group, and Halcyon. 2025. *The New Reality of Power Generation: An Analysis of Increasing Gas Turbine Costs in the U.S.* Available at: <https://gridlab.org/gas-turbine-cost-report/>.

<sup>35</sup> Ibid.



1 of skilled labor and qualified engineering, procurement, and construction (EPC)  
2 contractors, causing additional cost increases and delays.<sup>36,37</sup>

3 Figure 6 shows data from a recent survey of CC costs in U.S. utility filings. The  
4 initial costs in the figure (for a CC unit that comes online in 2026) are markedly  
5 higher than industry estimates from before the increase in turbine costs began. As  
6 recently as its 2025 IRP, Georgia Power used a cost of [REDACTED] (2025\$) for  
7 generic new CCs, lower than any of the actual CC costs shown in the figure.  
8 Costs continue to increase over time, and the cost of a CC that comes online in  
9 2031 is nearly a third higher in real terms than resources that come online in 2026,  
10 even before including the effects of inflation.

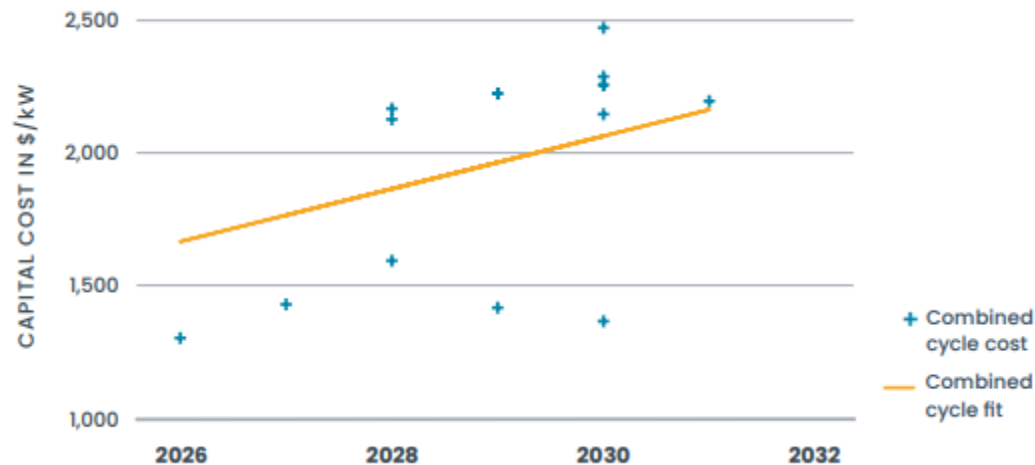
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<sup>36</sup> Ibid.

<sup>37</sup> Shenk, M. 2025. “Rush for US gas plants drives up costs, lead times.” *Reuters*. July 21.  
Available at: <https://www.reuters.com/business/energy/rush-us-gas-plants-drives-up-costs-lead-times-2025-07-21/>.



Figure 6. Overnight capital costs data from recent combined-cycle projects across the country (2025\$)



Source: GridLab, Energy Futures Group, and Halcyon. 2025. *The New Reality of Power Generation: An Analysis of Increasing Gas Turbine Costs in the U.S.*

**Q How have the capital costs of gas and battery resources changed since Georgia Power completed the analysis for its 2025 IRP?**

**A** Comparing the costs of the proposed projects to the assumptions that Georgia Power used in its 2025 IRP, gas CC costs have more than doubled, from [REDACTED] (2025\$) in the 2025 IRP to [REDACTED] for the proposed resources (TS Table 5). Even in the context of rising prices, Georgia Power’s prices are especially high compared to those that other utilities currently report and are higher than any of the estimates shown in Figure 6. McIntosh is the most expensive CC at [REDACTED] increase from the 2025 IRP Resource Mix Study. This is the highest cost estimate for a CC that I have seen in the United States. Including construction financing costs (AFUDC and Ad Valorem), the cost of the gas units is even higher at [REDACTED] for Bowen



1 Units 7–8, [REDACTED] for Wansley Units 10–11, and [REDACTED] for  
2 McIntosh Unit 12.<sup>38</sup>

3 Battery costs have also increased since the 2025 IRP, but more moderately. The  
4 proposed Company-owned battery projects have overnight capital costs in the  
5 range of [REDACTED], which is [REDACTED] higher than Georgia  
6 Power’s estimate in the 2025 IRP. Notably, all of the batteries have lower \$/kW  
7 installation costs than the Bowen, Wansley, and McIntosh CCs.

---

<sup>38</sup> TS All-Source RFP Certification Filing at 4.



1 **TS Table 5. Comparison of overnight capital costs of proposed Company-owned CC and**  
2 **BESS resources to values from IRP**

Unit Name	Nominal Capacity (MW)	Project Overnight Capital Cost (2025\$)	Cost per kW (2025\$/kW)	Projected Overnight Capital Cost from Resource Mix Study (2025\$/kW)	Percent increase
McIntosh 12 CC	757				
Bowen 7–8 CC	1482				
Wansley 10–11 CC	1453				
Yates 250 MW BESS	250				
Plant Mitchell – BESS only	150				
South Hall BESS	250				
Bowen Phase II BESS	250				
Yates 320 MW BESS	320				
McIntosh BESS	250				
Wansley BESS	500				
Thomson BESS	500				
Hammond Phase II BESS	192.5				
Bowen Phase 1 BESS	250				
Laurens County – BESS only	200				

3 *Sources: TS All-Source RFP Certification filing at 4; TS 2025 Integrated Resource Plan Resource Mix*  
4 *Study; TS Company response to STF-PIA-15-6. Prices from the Resource Mix Study are adjusted to match*  
5 *the commercial operation date of each resource. The costs shown for the Plant Mitchell and Laurens*  
6 *County paired solar and storage resources include the BESS components of the projects only.*



1     **Q**     **Do the cost estimates for the Bowen, Wansley, and McIntosh CCs that you**  
2           **discussed above include all the potential costs associated with the units,**  
3           **including the cost of obtaining firm gas service?**

4     **A**     No, they do not. Georgia Power plans to obtain firm gas supply for the Bowen,  
5           Wansley, and McIntosh CCs, which will add substantial additional fixed costs to  
6           the cost of operating the units (TS Table 6). Georgia Power will pay a total of  
7           ██████████ dollars per year for firm transport and storage at the CC units,  
8           including ██████████ for Bowen Units 7–8, ██████████ for Wansley Units 10–  
9           11, and ██████████ for McIntosh Unit 12. These are costs that Georgia Power  
10          will pay each year over the units’ 45-year lifetimes and do not include the cost of  
11          the fuel itself. Over the lifetime of the units, the net present value (NPV) of firm  
12          transport and storage costs is ██████████ (2025\$). On a per-kW basis, lifetime  
13          fixed fuel costs at McIntosh Unit 12 are the highest of the three plants, at ██████████  
14          ██████████ (2025\$).

15   **TS Table 6. Gas firm transport costs at the proposed CC units**

Category	McIntosh 12	Bowen 7–8	Wansley 10–11	Total
Fixed fuel costs (million \$/year)	██████████			
Firm transport cost (million \$/year)				
Storage cost (million \$/year)				
NPV of fixed fuel costs over 45-year lifetime (million 2025\$)	██████████			
Summer rated capacity (MW)	757	1,482	1,453	3,692
NPV of firm fuel costs per kW of summer capacity (2025\$ / kW)	██████████			

16   Source: TS response to STF-PIA-8-5, “Georgia Power RFP – Gas Forecast Bid Summary 10-29-2024.xlsx”  
17   and TS response to STF-PIA-1-2, “STF-PIA-1-2 Attachment A TRADE SECRET.xlsx.” The discount rate used  
18   to calculate the NPV is ██████████, consistent with the Company’s bid ranking analysis.



1     **Q     In addition to fixed costs, what risks do combined-cycle units pose to**  
2     **ratepayers?**

3     **A**     Because they are designed to run at high capacity factors, CC units expose  
4     ratepayers to fuel price volatility. Gas resources are already the single largest  
5     contributor to Georgia Power’s energy mix, which is currently 40 percent gas, 29  
6     percent nuclear, 16 percent coal, and 15 percent solar, hydro, and other  
7     renewables.<sup>39</sup> Adding the 3.7 GW of Company-owned gas CCs that Georgia  
8     Power proposes in this docket will expose ratepayers to additional fuel price  
9     volatility over the units’ 45-year lifetimes. The magnitude of the increase is not  
10    clear because the Company has not made generation forecasts for its system that  
11    include the full portfolio of RFP and supplemental resources available as part of  
12    this docket.

13    **Q     Explain the risks posed to ratepayers by fuel price volatility.**

14    **A**     High reliance on gas resources can expose ratepayers to fuel price volatility for  
15    which they cannot plan. Because gas is a global commodity, both domestic and  
16    global market forces impact price and demand for the resource. After roughly  
17    doubling from 2019 to 2024, North American liquified natural gas (LNG) export  
18    capacity is projected to more than double again by 2029, from current levels of  
19    11.4 billion cubic feet (Bcf) per day to more than 28 Bcf per day in 2029.<sup>40</sup> To put

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<sup>39</sup> Georgia Power 2025 IRP at 9.

<sup>40</sup> Young, J. 2025. “North America’s LNG export capacity could more than double by 2029.” U.S. Energy Information Administration. Available at: <https://www.eia.gov/todayinenergy/detail.php?id=66384>.



1           this in perspective, U.S. total gas consumption in 2023 averaged roughly 89 Bcf  
2           per day.<sup>41</sup> This leaves domestic markets exposed to global market dynamics.

3       **Q       How are volatile fuel costs passed on to ratepayers?**

4       **A**When the market is constrained and prices spike, those costs are passed directly to  
5           ratepayers. This happened in 2022 when Russia invaded Ukraine and European  
6           gas customers turned increasingly to U.S. gas. This drove up domestic gas prices,  
7           and those high costs were passed on directly to ratepayers. In its 2023 Fuel Cost  
8           Recovery filing, Georgia Power reported that it had accumulated an under-  
9           recovered fuel balance of \$2.1 billion over the previous two-and-half years.<sup>42</sup> The  
10          adjustment ultimately resulted in an increase of approximately \$16 per month for  
11          a typical residential customer.<sup>43</sup>

12       **ii.   The Company has not adequately evaluated the cost-effectiveness of the**  
13       **proposed CC units relative to alternatives, including a portfolio of CTs paired**  
14       **with solar resources**

15       **Q       How did the Company evaluate the bids that it received through its RFP?**

16       **A**Georgia Power narrowed the set of initial RFP bids that it received through three  
17          stages, as shown in TS Table 7. The Company accepted initial bids for the RFP

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<sup>41</sup> U.S. Energy Information Administration. 2025. “Natural Gas Consumption by End Use.” Available at: [https://www.eia.gov/dnav/ng/ng\\_cons\\_sum\\_dcu\\_nus\\_a.htm](https://www.eia.gov/dnav/ng/ng_cons_sum_dcu_nus_a.htm).

<sup>42</sup> Direct testimony of Sarah P. Adams and Adam D. Houston. Georgia Public Service Commission, Docket No. 44902. February 28, 2023.

<sup>43</sup> Rebuttal testimony of Sarah P. Adams and Adam D. Houston. Georgia Public Service Commission, Docket No. 44902. April 24, 2023.



1 through July 2024.<sup>44</sup> As the first stage of bid evaluation, it eliminated bids that did  
2 not comply with RFP requirements to create the Conforming List, which it  
3 published in October 2024.<sup>45</sup> Following a bid refresh process that concluded in  
4 February 2025, the Company prepared a net cost analysis that converted fixed and  
5 variable costs and energy benefits of each project into an NPV per kilowatt  
6 (\$/kW).<sup>46</sup> The Company used the results of this analysis, as well as a transmission  
7 analysis, to develop a Competitive Tier of projects in March 2025.<sup>47</sup> Finally, it  
8 announced a Short List of winning bids in May 2025.<sup>48</sup>

9 Because Georgia Power projects such a high near-term capacity need, it found  
10 that “all resources on the Conforming List and later stages of the All-Source RFP  
11 were needed to meet capacity needs in 2029 through 2031.”<sup>49</sup> After the  
12 Conforming List stage, the only bids it eliminated were mutually exclusive  
13 configurations of the same resources.<sup>50</sup> This meant that the resource types  
14 available at the conforming list stage had a strong influence on the types of  
15 resources that Georgia Power ultimately selected.

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<sup>44</sup> All-Source Certification Filing at 7–9 and Direct Testimony of Curylo, Grubb, and Looney at 10–11.

<sup>45</sup> Ibid.

<sup>46</sup> Ibid.

<sup>47</sup> Ibid.

<sup>48</sup> Ibid.

<sup>49</sup> Company response to STF-PIA-3-4.

<sup>50</sup> Ibid.



1 **TS Table 7. Bid evaluation process from All-Source Capacity RFP**

Stage	Number of Bids	Unique Winter Capacity (GW)	Date Announced	Reasons Bids Were Removed
Initial Bids	54 proposals	15.5	July 2024	Bids that did not satisfy RFP requirements, including posting bid security, were released
Conforming List	33 proposals	10.5	October 2024	Mutually exclusive ownership structures for Plant Harris and Wansley CCs were released
Competitive Tier	25 proposals	9.8	March 2025	Mutually exclusive configuration of Bowen (with two additional CC units) was released [REDACTED] [REDACTED] [REDACTED] [REDACTED]
Short List	21 proposals	8.2	May 2025	Winning proposals

2 *Sources: Number of bids, unique winter capacity, and date announced are from the All-Source*  
3 *Certification Filing at 7–9. Reasons for bid removal are from TS Company response to STF-PIA-3-1,*  
4 *“STF-PIA-3-1 Attachment TRADE SECRET.xlsx” and from Company response to STF-PIA-15-3.*

5 **Q Did the Company select any new CT resources as part of its portfolio of RFP**  
6 **and supplemental resources?**

7 **A** No, the Company could not have selected new CT resources as part of its  
8 portfolio of resource additions, [REDACTED]

9 [REDACTED]  
10 [REDACTED]  
11 [REDACTED]



1 [REDACTED] It did not submit any proposals for Company-owned CT capacity to  
2 the RFP.<sup>52</sup> [REDACTED]

3 [REDACTED] This left only 220 MW of existing CT capacity at the Sandersville and  
4 Dahlberg plants and no new CT capacity available for Georgia Power's full bid  
5 evaluation process.

6 In other words, when Georgia Power made the decision not to bid any CT units  
7 into the RFP, it essentially predetermined an outcome where the only new gas  
8 units it would select would be CCs and not CTs. It never had the option during the  
9 RFP process to consider the economics of a portfolio containing CTs to a  
10 portfolio with the proposed CC units.

11 **Q Why did Georgia Power choose to bid only CC units and not CT units into**  
12 **the RFP?**

13 **A** Georgia Power's decision was based on the characteristics of the units in  
14 isolation. The Company writes that:

15 *"The Company's decision was based on the Company's expansion*  
16 *plans and expectations that projected capacity needs would be*  
17 *energy intensive and base load in nature. Combined cycles*  
18 *("CCs") operate with greater efficiency and lower cost than*

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<sup>51</sup> Company response to STF-PIA-1-3, "STF-PIA-1-3 Attachment K TRADE SECRET.pptx" at 3.

<sup>52</sup> Company response to STF-PIA-3-37.

<sup>53</sup> Company response to STF-PIA-1-3, "STF-PIA-1-3 Attachment K TRADE SECRET.pptx" at 5.



1                    *simple cycle combustion turbines (“CTs”) and are therefore better*  
2                    *suited to economically fulfill base load needs.”<sup>54</sup>*

3                    While it is true that a CC unit is a more efficient baseload generator than a CT in  
4                    isolation, the more relevant question is whether a CT paired with low-cost energy  
5                    resources such as solar would be lower cost than a CC unit. This is the type of  
6                    question that capacity expansion modeling, which allows the model to select new  
7                    resources based on both capacity and energy costs, is well-suited to answer.  
8                    Georgia Power did not complete any capacity expansion modeling for this docket,  
9                    saying that its high capacity need made this type of modeling unnecessary.<sup>55</sup> The  
10                    most recent capacity expansion modeling that Georgia Power completed was for  
11                    its 2025 IRP.<sup>56</sup>

12        **Q        Does the Company’s existing capacity expansion modeling from its 2025 IRP**  
13        **justify its decision not to bid CTs into the RFP?**

14        **A** Not necessarily. The MG0 scenario from the 2025 Resource Mix Study includes  
15                    more CTs relative to CCs than Georgia Power’s proposed resources. Considering  
16                    both Company-owned and PPA resources, only one-fifth of the gas capacity in  
17                    Georgia Power’s proposed portfolio is from CTs (with the remainder from CCs),  
18                    compared to two-fifths of the gas additions through 2031 in the MG0 scenario  
19                    from the Resource Mix Study.<sup>57</sup> This suggests that a higher proportion of CTs

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<sup>54</sup> Company response to STF-PIA-3-37.

<sup>55</sup> Company response to STF-PIA-3-4 and STF-PIA-8-2.

<sup>56</sup> Company response to STF-PIA-8-2.

<sup>57</sup> 2025 Integrated Resource Plan Resource Mix Study, “Capacity Expansion Plans – 2025 IRP.xlsx.”



1 than the portfolio Georgia Power is currently proposing would be more economic  
2 for ratepayers.

3 As I discussed in Section 4, gas equipment costs have increased substantially  
4 since Georgia Power completed its 2025 IRP modeling, meaning that the  
5 Company's modeling results from the IRP no longer reflect current market  
6 conditions. While the Company did model a high gas equipment price sensitivity  
7 as part of the 2025 IRP docket, it has not completed any capacity expansion  
8 modeling using the specific resource costs of the proposed Bowen, Wansley, and  
9 McIntosh CC units compared to alternatives.<sup>58</sup> Before committing to construction  
10 of these units, the Company should use current resource costs to re-evaluate  
11 whether CTs or additional BESS paired with solar would be lower cost than one  
12 or more of the CC units.

13 **Q How should Georgia Power compare the costs and benefits of different types**  
14 **of resources?**

15 **A** Rather than deciding which type of resource to bid into the RFP based on resource  
16 characteristics in isolation, Georgia Power should consider the value of portfolios  
17 of resource additions together. Specifically, it should evaluate whether a CT or  
18 additional battery storage paired with solar would be lower cost than one or more  
19 of the proposed CCs. The Company already uses a resource portfolio approach for  
20 certain aspects of its RFP analysis, for example to analyze the transmission costs  
21 associated with different combinations of Company-owned CC resources.<sup>59</sup> It  
22 should extend this approach to analyzing the relative benefits of CCs (which

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<sup>58</sup> Rebuttal Testimony of Grubb, Hubbert, Looney, Robinson, and Valley. Georgia Public Service Commission, Docket Nos. 56002 & 56003. June 9, 2025.

<sup>59</sup> Company response to STF-PIA-3-5.



1 provide both energy and capacity) to portfolios of resources that separately  
2 provide capacity and energy.

3 ***iii. Georgia Power should remove the most expensive and risky resources from its***  
4 ***proposed portfolio and focus its near-term procurement on no-regrets solutions***

5 **Q Why is the Company moving ahead with McIntosh Unit 12 and the other CC**  
6 **units, given how much capital costs have risen since the time of the 2025**  
7 **IRP?**

8 **A** To serve projected load on the timeline outlined (2031), Georgia Power had to  
9 accept almost all of the capacity from the RFP, regardless of the cost. As part of  
10 its RFP bid evaluation, Georgia Power ranked the bids it received according to  
11 their cost-effectiveness, but there was no threshold at which the Company would  
12 have eliminated bids as being too uneconomic to pursue.<sup>60</sup>

13 **Q How would reducing the quantity of procurement change the resources**  
14 **Georgia Power would select?**

15 **A** Reducing the quantity of resources procured to match only the quantity of load  
16 with contracts for electric service in place would allow Georgia Power to release  
17 the least cost-effective projects from its set of proposed resources. Specifically, I  
18 recommend that Georgia Power make the following adjustments:

- 19 • Release McIntosh Unit 12, due to the unit's high capital costs, high firm fuel  
20 costs, and the fact that its capacity is not needed to serve contracted  
21 customers.

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<sup>60</sup> Company response to STF-PIA-8-4.



- 1       • Re-assess whether it needs the full amount of capacity from the Bowen and
- 2       Wansley CC units to serve contracted customers, and whether CTs and
- 3       batteries or solar could provide equivalent capacity and energy at lower cost
- 4       and risk.
- 5       • Prioritize the RFP and supplementary BESS projects for near-term
- 6       procurement.

7       **Q       Why is it beneficial for ratepayers for Georgia Power to focus on BESS**  
8       **resources for near-term procurement?**

9       **A**The proposed RFP and supplemental battery storage resources have lower \$/kW  
10       installation costs than the CC resources, in part because of their shorter useful  
11       lives (20 years for batteries compared to 45 years for CCs). The 20-year lifetime  
12       of BESS resources aligns more closely with typical data center contract length.  
13       This makes batteries more appropriate resource additions for this time of  
14       uncertain future load growth, when it is unclear how quickly data center load will  
15       materialize and how long it will last. Additionally, battery storage is more  
16       modular than CC units, so Georgia Power can adjust the quantity it procures in a  
17       given year based on current market conditions. In contrast, CCs have useful lives  
18       that are two to three times longer than the maximum length of a data center  
19       contract and will lock ratepayers into 45 years of capital costs and fuel costs over  
20       the resource's lifetime.

21       Another advantage of battery storage is that it can be paired with solar and wind  
22       as low-cost energy sources which have zero exposure to fuel price volatility once  
23       they are constructed. CCs will expose ratepayers to future risks from fuel price  
24       volatility.



1 Finally, batteries offer shorter construction timelines than CC units. The Company  
2 can bring new BESS online in only 16 to 24 months,<sup>61</sup> compared to 30 months for  
3 a CT and 36 months or more for a CC.<sup>62</sup> Of the proposed resources in this docket,  
4 the earliest to come online are the NEER and Wadley BESS projects, which add  
5 battery storage to solar resources with existing interconnection rights.<sup>63</sup> This is  
6 advantageous because it allows Georgia Power to avoid lengthy interconnection  
7 delays for new customers.

8 **6. GEORGIA POWER SHOULD PURSUE STRATEGIES AND SAFEGUARDS TO MINIMIZE THE**  
9 **COST IMPACTS OF LARGE-LOAD CUSTOMER GROWTH AND PROTECT ITS EXISTING**  
10 **RATEPAYERS**

11 ***6. i. Customer demand flexibility and distributed energy resources can help***  
12 ***minimize the cost of serving prospective large-load customers***

13 **Q Why might the addition of large-load customers increase system costs?**

14 **A** Historically, utilities such as Georgia Power have planned mainly for incremental  
15 load additions, such as those from typical residential, commercial, and small  
16 industrial customers (i.e., non-large-load customers). When load growth is slow  
17 and steady, system planners have time to respond and serve the load either with  
18 existing resources or with new resources that minimally increase system costs.  
19 Under this paradigm, load growth can work to lower rates, because fixed system  
20 costs are spread across a larger number of customers. For example, there is  
21 evidence that states that experienced load growth over the past five years also saw

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<sup>61</sup> Company response to STF-PIA-8-11.

<sup>62</sup> Company response to STF-PIA-3-37.

<sup>63</sup> Company response to STF-PIA-3-35.



1 downward pressure on rates, as steadily increasing customer demand balanced  
2 utility investments in maintaining existing transmission and distribution  
3 infrastructure.<sup>64</sup>

4 Because of the pace and magnitude of data center load growth, there is a risk that  
5 large-load additions will instead lead to an increase in overall per-kilowatt-hour  
6 system costs. The rapid surge in demand from data centers has caused supply  
7 constraints for both capacity from existing generators and the equipment to build  
8 new generators, driving up costs and causing utilities to build generation  
9 resources that are more expensive than the average resource already on the grid.<sup>65</sup>  
10 As these resources begin to enter utility rate bases, they will tend to push rates  
11 upward. In addition to generator costs, large-load additions often necessitate  
12 costly investments in supporting infrastructure such as transmission and gas  
13 pipelines.

14 **Q How would customer flexibility requirements help reduce the cost of serving**  
15 **large-load customers?**

16 **A** Managing system costs from large-load additions is key for both maintaining  
17 Georgia’s economic competitiveness and protecting existing ratepayers, as I  
18 discuss in more detail below. One key strategy available to Georgia Power is to

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<sup>64</sup> Wiser, R, et al. 2025. *Factors Influencing Recent Trends in Retail Electricity Prices in the United States: What do we know? Where are the gaps?* Lawrence Berkeley National Laboratory and The Brattle Group. Available at: [http://eta-publications.lbl.gov/sites/default/files/2025-10/full\\_summary\\_retail\\_price\\_trends\\_drivers.pdf](http://eta-publications.lbl.gov/sites/default/files/2025-10/full_summary_retail_price_trends_drivers.pdf).

<sup>65</sup> Glick, D. 2025. “Everything Everywhere All at Once: Managing the size and pace of large load additions by using existing resource and infrastructure more efficiently.” Presentation at the North Carolina Utilities Commission Large Load Technical Conference, October 14, 2025. Docket No. E-100, Sub 208.



1           incentivize customer flexibility. Often, much of the cost of serving a new large-  
2           load customer is driven by transmission and generation investments needed to  
3           maintain grid reliability during only a few hours of peak grid stress per year. The  
4           U.S. power sector currently operates at a relatively low load factor.<sup>66</sup> The Georgia  
5           Power system specifically has operated at a load factor of 60–65 percent for the  
6           past ten years, similar to the value for Southern Company as a whole.<sup>67</sup> This  
7           means that there is space to incorporate additional load using existing resources  
8           with only a few hours of customer flexibility per year. One recent study found  
9           that the Southern Company system could serve up to 6.4 GW of new load using  
10          existing resources, if the load could be curtailed for 0.25 percent of hours in the  
11          year (22 hours).<sup>68</sup> In the short term, customer flexibility will help Georgia Power  
12          avoid locking in high costs for new gas generation, and in the long term, it will  
13          help enable these customers to be served by a combination of renewables and  
14          battery storage.

15   **Q       What are strategies Georgia Power could use to incorporate greater large-**  
16           **load flexibility into its system?**

17   **A**Georgia Power is in conversation with large-load customers about load flexibility  
18           and demand-side management programs, but so far it has not incorporated the

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<sup>66</sup> A load factor measures the ratio between average demand and peak demand over a given period.

<sup>67</sup> Company response to STF-PIA-1-18.

<sup>68</sup> Norris, T, Profeta, T, Patino-Echeverri, D, and Cowie-Haskell, A. 2025. *Rethinking Load Growth: Assessing the Potential for Integration of Large Flexible Loads in US Power Systems*. Nicholas Institute for Energy, Environment, and Sustainability. Available at: <https://nicholasinstitute.duke.edu/sites/default/files/publications/rethinking-load-growth.pdf>.



1 impacts of this into its load forecast.<sup>69</sup> The same is true of behind-the-meter  
2 generation at new large-load customer sites.<sup>70</sup> Customers are much more likely to  
3 be able to provide flexibility if they plan for it from the start, rather than  
4 retrofitting flexibility measures into an existing data center or factory. Asking data  
5 center customers to join demand response programs after they have already come  
6 online is unlikely to be successful. Instead, Georgia Power should look for ways  
7 to lock in customer commitments to load flexibility before these facilities  
8 interconnect, for example by offering financial incentives if data centers agree to  
9 flexibility requirements as part of their contract for electric service. With higher  
10 levels of assurance that data centers are committed to providing demand response,  
11 Georgia Power could then incorporate this customer flexibility into its resource  
12 planning and procurement strategy, reducing the quantity of generation resources  
13 it will need to procure.

14 Other utilities are already adopting this approach. For example, Google executed  
15 a successful demonstration with the Omaha Public Power District in which data  
16 centers reduced machine learning workloads during three emergency grid events  
17 in 2024.<sup>71,72</sup> Google has since executed contracts that include demand response

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<sup>69</sup> Company response to STF-PIA-6-3

<sup>70</sup> Company response to STF-PIA-6-4.

<sup>71</sup> Ciampoli, P. 2025. "Google, TVA Enter Agreement Tied to Data Center Demand Response." *American Public Power Association*. August 4. Available at: <https://www.publicpower.org/periodical/article/google-tva-enter-agreement-tied-data-center-demand-response>.

<sup>72</sup> Giacobone, B. 2025. "Google expands demand response to target machine learning workloads." *Latitude Media*. August 4. Available at: <https://www.latitudemedia.com/news/google-expands-demand-response-to-target-machine-learning-workloads/>.



1 provision with Indiana Michigan Power, the Tennessee Valley Authority, and  
2 Entergy Arkansas.<sup>73,74</sup>

3 **Q How can data transparency assist Georgia Power in establishing customer**  
4 **commitments to demand flexibility?**

5 **A** Data transparency is another important consideration for flexibility commitments.  
6 Data centers are often not party to dockets, leaving the utility, intervenors, and the  
7 Commission with little ability to determine how much load flexibility a customer  
8 can provide. Requiring prospective customers to provide information about the  
9 type and amount of flexibility they are capable of would assist the Company and  
10 intervenors in understanding and incorporating this capability into resource  
11 procurement decisions.

12 **Q What are other strategies Georgia Power could pursue to reduce the cost of**  
13 **serving large-load customers?**

14 **A** Data centers are increasingly looking to locate in areas where utilities are thinking  
15 creatively about solutions to load growth, beyond procuring large supply-side  
16 resources to meet growing demand. For example, existing distributed energy  
17 resources such as electric vehicle and home BESS systems can be aggregated into  
18 distributed power plants (also commonly known as virtual power plants),  
19 reducing the need for new generation resources. A recent study by Wood  
20 Mackenzie found that the number of North American distributed power plant

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<sup>73</sup> Ibid.

<sup>74</sup> Sasser, S. 2025. "Google investment to equal \$4 billion for West Memphis data center." *Arkansas Democrat Gazette*. October 2. Available at: <https://www.arkansasonline.com/news/2025/oct/02/google-investment-to-equal-4-billion-for-west/>.



1        deployments reached 1,940 in 2025, a 33 percent increase from 2024.<sup>75</sup> Adoption  
2        was particularly robust in areas experiencing substantial data center load growth,  
3        and the need for generating resources to serve data centers could drive even  
4        higher levels of growth over the next three to five years.<sup>76</sup> Energy parks, which  
5        involve co-location of data centers and generating resources behind a single point  
6        of interconnection, can also help serve data center load at lower cost and reduce  
7        interconnection time. To take advantage of this approach, Google recently entered  
8        a partnership with developer Intersect Power and investor TPG Rise Climate  
9        aiming to invest \$20 billion in co-located renewable, battery storage, and data  
10       center facilities over the next five years.<sup>77,78</sup> The first project will begin operation  
11       in 2026 and be fully complete by 2027.<sup>79</sup> Pursuing these types of strategies will  
12       help Georgia Power maintain its competitive edge and reduce the quantity of  
13       traditional generating resources it needs to procure to serve large-load customers.

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<sup>75</sup> Martucci, B. 2025. “Data center demand drives 33% jump in VPP deployments: Wood Mackenzie.” *Utility Dive*. September 22. Available at: <https://www.utilitydive.com/news/data-center-vpp-virtual-power-wood-mackenzie/760731/>.

<sup>76</sup> Id.

<sup>77</sup> Flávia Rochas, A. 2025. “AI boom spurs Big Tech to build clean power on site.” *Reuters*. February 5. Available at: <https://www.reuters.com/business/energy/ai-boom-spurs-big-tech-build-clean-power-site-2025-02-05/>.

<sup>78</sup> Skidmore, Z. 2024. “Google plans ‘gigawatts of data center capacity’ in Intersect Power and TPG Rise Climate partnership.” *Data Center Dynamics*. December 10. Available at: <https://www.datacenterdynamics.com/en/news/google-partners-with-intersect-power-and-tpg-rise-climate-to-colocate-new-data-center-load-with-clean-power-generation/>.

<sup>79</sup> Ibid.



1       ii. Georgia Power should put structures in place to ensure that large-load  
2       customers are paying their full incremental cost of service, including the cost of  
3       the proposed resources in this docket

4       **Q**     What risks do prospective large-load customers pose to Georgia Power's  
5       existing ratepayers?

6       **A**     Load growth from large-load customers, and in particular data centers, poses  
7       several risks to all other ratepayers—both in scenarios where the load  
8       materializes, as well as in scenarios where it does not.

9       First, there is the risk that Georgia Power builds resources and supporting  
10      infrastructure for prospective customer load that may not materialize fully or at  
11      all. If load does not materialize at the level Georgia Power currently projects,  
12      existing ratepayers may be left paying for unneeded assets. As discussed above,  
13      this can be addressed by only building to meet load with signed contracts.

14      Second, even if the load does materialize, large generation additions and  
15      transmission upgrades can increase system costs for all ratepayers under current  
16      tariff structures. This can result from increases in resource and bilateral contract  
17      costs, additional transmission and gas infrastructure investments, and general  
18      cost-shifting if rates and tariffs are not designed correctly to ensure data center  
19      and other large-load customers cover their full incremental cost of service.<sup>80</sup>

20      In addition to these risks, large-load customers can also bring economic benefits.  
21      Georgia Power has been actively seeking to attract large-load customers—27

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<sup>80</sup> A new large load customer's incremental cost includes (1) the increase in variable costs as a result of serving the load, (2) the new customer's share of the existing system's fixed costs, and (3) any new system costs (e.g., investment in new generation assets) incurred to serve the load.



1 percent of large load in the request and contract for service categories in 2031 is  
2 from customers outside of the Company’s service area who chose to select  
3 Georgia Power as their service provider.<sup>81</sup> However, it is important to ensure that  
4 all large-load customers pay their fair share for electricity, so that economic  
5 development is not pursued at the expense of existing ratepayer’s electricity costs.

6 **Q What actions have the Commission and Georgia Power already taken to**  
7 **address the risks associated with large-load customers?**

8 **A** Georgia Power and the Commission have already begun to address the risks  
9 outlined above. In December 2024, the Company filed an application with the  
10 Commission to modify its Rules and Regulations for Electric Service. The  
11 modifications give the Company discretion to implement additional terms and  
12 conditions in the contracts for electric service for customers over 100 MW,  
13 including longer contract terms, minimum billing requirements, and contract  
14 termination provisions.<sup>82</sup> The Commission approved these revisions in January  
15 2025, directing that Georgia Power should exercise its increased discretion “to  
16 protect existing customers from bearing any of the costs of adding these large  
17 customers.”<sup>83</sup> Georgia Power subsequently revised several of its tariffs, including  
18 the TOU-SC Monthly Access Charge Option (MAC), which is currently the only

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<sup>81</sup> Q2 2025 Economic Development Report.

<sup>82</sup> “Request for Approval of Revisions to Georgia Power Company’s Rules and Regulations.” Georgia Public Service Commission, Docket No. 44280. December 11, 2024.

<sup>83</sup> “Order Approving Revisions to Georgia Power Company’s Rules and Regulations.” Georgia Public Service Commission, Docket No. 44280. January 28, 2025.



1 tariff available to new customers over 100 MW.<sup>84,85</sup> It also worked with Staff to  
2 develop terms and conditions for inclusion in large-load customer contracts.<sup>86</sup>  
3 Finally, the Commission’s order requires Georgia Power to provide Staff with  
4 copies of new contracts within 30 days of execution.

5 **Q Are the January 2025 modifications to the Rules and Regulations sufficient**  
6 **to protect Georgia Power’s ratepayers from the risks of large-load customer**  
7 **growth?**

8 **A** These actions are a step in the right direction but are not sufficient to fully protect  
9 existing ratepayers. Georgia Power has articulated its intention to implement  
10 tariffs and customer commitments such that large-load customers pay their full  
11 incremental cost of service, but it is unclear whether it has fully followed through  
12 on implementing the necessary protections. Additional action is needed in two  
13 main areas.

14 First, there is a need for greater transparency about the ratepayer protections  
15 included in the Company’s large-load contracts. It is currently unclear what  
16 magnitude of minimum billing requirements, contract term lengths, and other  
17 safeguards the Company requires as part of its large-load contracts.<sup>87</sup>

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<sup>84</sup> “Order on Georgia Power Company’s Revision to Rules and Regulations Tariff Compliance Filing.” Georgia Public Service Commission, Docket No. 44280. April 17, 2025.

<sup>85</sup> Company response to STF-PIA-8-8.

<sup>86</sup> “Order on Georgia Power Company’s Revision to Rules and Regulations Tariff Compliance Filing.” Georgia Public Service Commission, Docket No. 44280. April 17, 2025.

<sup>87</sup> Company response to STF-PIA-3-33.



1 Second, there is a need for more complete information about the incremental cost  
2 of serving data center customers and whether tariffs are set such that these  
3 customers are paying for their full incremental cost of service, including the cost  
4 of supporting infrastructure. For example, Georgia Power has not prepared a  
5 system-wide analysis quantifying whether incremental revenues from new load  
6 contracts are expected to recover the revenue requirements associated with the  
7 RFP and supplemental resources,<sup>88</sup> nor has it calculated the impact of large-load  
8 customer additions on its total revenue requirement.<sup>89</sup>

9 Without information about the safeguards already in place and the incremental  
10 cost of serving large-load customers, it is impossible to know whether existing  
11 tariffs and contract terms are sufficient to ensure that large-load customers are  
12 paying their full incremental costs, or if additional safeguards are needed. The  
13 magnitude of resource additions contemplated in this application, all of which  
14 would not be needed but for data center load growth, means that it is critical to  
15 make sure that these risks are fully addressed. In addition, transparency is key in  
16 narrowing the pipeline of prospective customers to only those who are serious  
17 about locating within Georgia.

18 **Q What are some features common among large-load tariffs?**

19 **A** If increased transparency reveals that existing safeguards are not sufficient, a  
20 variety of techniques are available to the Company to ensure that existing  
21 ratepayers do not bear the costs of serving large-load customers. Some general  
22 principles for large-load tariffs include the following:

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<sup>88</sup> Company response to STF-PIA-3-33.

<sup>89</sup> Company response to STF-PIA-7-1.



- 1       • Requirement that load over a certain MW threshold—as measured at an
- 2       individual facility, or across multiple facilities owned by the same company—
- 3       be on a large-load customer tariff
- 4       • Commitment for tariff participants to pay at a minimum the cost of
- 5       incremental generation not needed “but for” the facility for a substantial
- 6       portion of the asset life, and in some cases including an additional risk
- 7       premium
- 8       • Minimum-take requirements/minimum monthly demand based on contracted
- 9       capacity, minimum contract term (years), and exit fees, all of which Georgia
- 10      Power has begun to implement and could strengthen further as needed
- 11      • Incentives for demand response, demand flexibility, interruptible load, and
- 12      energy efficiency, for facilities where these measures are feasible
- 13      • Commitment on the part of the utility or load-serving entity to develop
- 14      renewable energy resources consistent with jurisdictional goals as well as the
- 15      customer’s corporate commitments (e.g., through clean energy tariffs)
- 16      • Payment from the tariff participants of incremental costs to build out
- 17      distribution, transmission, and firm gas infrastructure
- 18      • Additional investment in community, economic development, and low-
- 19      income programs
- 20      Several recent industry and expert reports discuss these and other principles in
- 21      more detail.<sup>90</sup>

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<sup>90</sup> See, e.g., Sherwood, Stacy, *Review of large load tariffs to identify safeguards and protections for existing ratepayers*. Energy Futures Group prepared on behalf of Earthjustice. January 28, 2025; Winson, John D., Zimmerman, Zach, and Gramlich, Rob. *Strategic industries surging: driving US power demand*. Grid Strategies. December 2024.



1     **Q**     **In conclusion, what are your recommendations regarding the Company's**  
2             **requests in this docket?**

3     **A**     I recommend that the Commission allow Georgia Power to procure resources only  
4             for large-load customers that have signed contracts for electric service. This will  
5             reduce the size of Georgia Power's resource need in 2031 to [REDACTED] in summer  
6             and [REDACTED] in winter, allowing it to remove the most expensive and risky  
7             resources from its portfolio of requests in this docket. In particular, I recommend  
8             that Georgia Power remove McIntosh Unit 12 from its portfolio and focus its  
9             near-term procurement on no-regrets solutions, primarily battery storage  
10            resources. Before approving any of the proposed Company-owned CCs, the  
11            Commission should instruct Georgia Power to evaluate whether an alternative  
12            resource portfolio, for example CTs or additional battery storage paired with  
13            solar, would be a more cost-effective solution under current market conditions. I  
14            also recommend that Georgia Power pursue strategies such as demand flexibility  
15            to manage the costs of large-load additions. Finally, I recommend that the  
16            Company should increase transparency into the terms of its large-load contracts  
17            and ensure that these customers are paying their full incremental cost of service.

18    **Q**     **Does this conclude your testimony?**

19    **A**     Yes.



# LM-1: Resume of Lucy Metz



## Lucy Metz, Senior Associate

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Synapse Energy Economics | 485 Massachusetts Avenue, Suite 3 | Cambridge, MA 02139

lmetz@synapse-energy.com

## PROFESSIONAL EXPERIENCE

**Synapse Energy Economics Inc.**, Cambridge, MA. *Senior Associate* April 2025 – Present; *Associate* April 2023 – April 2025; *Research Associate*, July 2022 – April 2023.

- Provides expert research, analysis, and deliverables on energy-sector issues, including electric utility resource planning and power plant economics, building decarbonization, industrial sector emissions, and state and local climate policy
- Supports the development of testimony and comments in integrated resource planning dockets, rate cases, certificates of need, and environmental compliance investment dockets across the country
- Conducts analysis using Synapse's Building Decarbonization Calculator (BDC), a stock turnover model that calculates the emissions and energy impacts of heat pump adoption
- Produces data visualization tools in R, including interactive webtool of U.S. industrial emitters
- Assists with power sector dispatch modeling using EnCompass

**Laboratory of Dr. Alexander Barron**, Department of Environmental Science and Policy, Smith College, Northampton, MA. *Research Assistant*, June 2020 – May 2022

- Co-authored paper on carbon neutrality initiatives in higher education
- Designed data visualization and analysis for USREP-ReEDS modeling of Clean Air Act policy
- Calculated CO<sub>2</sub> emissions reductions achievable under Massachusetts climate legislation and drafted white paper with results

**Co-Equal**, Washington, D.C. *Policy Intern*, February 2021 – March 2022.

- Performed analysis on a wide range of policy topics requested by members of Congress
- Finalized economic modeling study for public release and presented results
- Coordinated with research team at MIT and Co-Equal to meet policy-relevant deadlines

## EDUCATION

**Smith College**, Northampton, MA

Bachelor of Science in Engineering Science, *Magna Cum Laude with Highest Honors*, 2022

## SKILLS

Computer: Excel, R, EnCompass, MATLAB, Mathematica, ENERGY STAR Portfolio Manager



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Languages: Spanish (proficient)

## TESTIMONY

**North Carolina Utilities Commission (Docket Nos. E-2, Sub 1349 and EC-67, Sub 57):** Direct testimony of Lucy Metz in the matter of the Joint Application of Duke Energy Progress, LLC, and North Carolina Electric Membership Corporation for a Certificate of Public Convenience and Necessity to Construct a 1,360 MW Natural Gas-Fired Combined Cycle Electric Generating Facility in Person County, North Carolina. On behalf of the Southern Alliance for Clean Energy (SACE). June 9, 2025.

**Kansas Corporation Commission (Docket No. 25-EKCE-207-PRE):** Settlement testimony of Lucy Metz in Support of Unanimous Partial Settlement on Solar Facility and Testimony in Opposition to Non-Unanimous Partial Settlement on Natural Gas Facilities. On behalf of Citizens' Utility Ratepayer Board (CURB). April 17, 2025.

**Kansas Corporation Commission (Docket No. 25-EKCE-207-PRE):** Direct testimony of Lucy Metz in the matter of the Petition of Evergy Kansas Central, Inc., Evergy Kansas South, Inc., and Evergy Metro, Inc. for Determination of the Ratemaking Principles and Treatment that Will Apply to the Recovery in Rates of the Costs to Be Incurred for Certain Electric Generation Facilities under K.S.A. 66-1239. On behalf of Citizens' Utility Ratepayer Board (CURB). March 14, 2025.

**Public Service Commission of Wisconsin (Docket No. 6690-UR-128):** Surrebuttal testimony of Lucy Metz in the matter of the Application of Wisconsin Public Service Corporation for Authority to Adjust Electric and Natural Gas Rates. On behalf of Sierra Club. September 18, 2024.

**Public Service Commission of Wisconsin (Docket No. 6690-UR-128):** Direct testimony of Lucy Metz in the matter of the Application of Wisconsin Public Service Corporation for Authority to Adjust Electric and Natural Gas Rates. On behalf of Sierra Club. August 19, 2024.

**Georgia Public Service Commission (Docket No. 55378):** Direct Testimony of Devi Glick and Lucy Metz in re: Georgia Power Company's 2023 Integrated Resource Plan Update. On behalf of Sierra Club. February 15, 2024.

## PUBLICATIONS

Eash-Gates, P., S. Koester, L. Metz, J. Hittinger, A. Hopkins, I. Weiss. 2025. *Recasting the Future: Policy Approaches to Drive Cement Decarbonization*. Synapse Energy Economics for Clean Air Task Force.

Glick, D., T. Gyalmo, D. Karabakal, L. Metz, C. Resor. 2024. *Review of Tennessee Valley Authority's Draft 2025 Integrated Resource Plan*. Synapse Energy Economics for Sierra Club.

DeLeon, S., K. Takahashi, E. Carlson, A. S. Hopkins, S. Kwok, J. Litynski, C. Mattioda, L. Metz. 2024. *Minnesota Building Decarbonization Analysis: Equitable and cost-effective pathways toward net-zero emissions for homes and businesses*. Synapse Energy Economics for Clean Heat Minnesota.



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Shenstone-Harris, S., A. Zeng, L. Metz, M. Whited. 2024. *On the Road to Fleet Electrification: A Framework for Estimating Distribution System Impacts of Medium- and Heavy-Duty Vehicle Electrification*. Synapse Energy Economics for Advanced Energy United.

Eash-Gates, P., L. Metz, K. Schultz, S. Kwok, A. Hopkins. *Connecticut Comprehensive Energy Strategy: Buildings White Paper*. Prepared by Synapse Energy Economics for Connecticut Department of Energy and Environmental Protection. Forthcoming.

Eash-Gates, P., L. Metz, S. Kwok, K. Schultz, K. Takahashi. *Pathways for Connecticut Building Decarbonization: Analysis of Thermal Decarbonization Scenarios Aligned to the Global Warming Solutions Act*. Prepared by Synapse Energy Economics for Connecticut Department of Energy and Environmental Protection. Forthcoming.

Metz, L., A. Napoleon, P. Eash-Gates. *Memo: Equity Metrics for Building Thermal Decarbonization in Connecticut*. Prepared by Synapse Energy Economics for Connecticut Department of Energy and Environmental Protection. Forthcoming.

Metz, L., E. Carlson, O. Griot. 2023. *Methane Waste and Pollution State Factsheets*. Synapse Energy Economics for the Environmental Defense Fund.

Eash-Gates, P., O. Griot, A. Hopkins, L. Metz, E. Sinclair, J. Smith. 2023. *Coming Clean on Industrial Emissions: Challenges, Inequities, and Opportunities in U.S. Steel, Aluminum, Cement, and Coke*. Prepared by Synapse Energy Economics for Sierra Club.

Frost, J., P. Knight, S. Sharaf, L. Metz, and S. Kwok. 2023. *RGGI's Economic Benefits for Pennsylvania: Exploring the benefits of the Regional Greenhouse Gas Initiative*. Prepared by Synapse Energy Economics for Evergreen Collaborative.

Metz, L., M. Whited, P. Rhodes, E. Carlson. 2023. *Distribution System Investments to Enable Medium- and Heavy-Duty Vehicle Electrification*. Synapse Energy Economics for the Environmental Defense Fund.

Knight, P., J. Frost, T. Fitch, E. Sinclair, J. Taberner, O. Griot, B. Havumaki, J. Smith, L. Metz, S. Chavin. 2023. *TVA's Clean Energy Future: Charting a course to decarbonization in the Tennessee Valley*. Synapse Energy Economics for GridLab and Center for Biological Diversity.

Yuan, M., A. Barron, N. Selin, P. Picciano, L. Metz, J. Reilly, and H. Jacoby. 2022. "Meeting U.S. greenhouse gas emissions goals with the international air pollution provision of the Clean Air Act." *Environmental Research Letters* 17 (5): 054019.

Barron, A., M. Domeshek, L. Metz, L. Draucker, and A. Strong. 2021. "Carbon neutrality should not be the end goal: Lessons for institutional climate action from U.S. higher education." *One Earth* 4 (9): 1248–1258.

Longnecker, E., L. Metz, R. Miller, and A. Berke. 2021. "Probing Liquid–Liquid Phase Separation in Secondary Organic Aerosol Mimicking Solutions Using Articulated Straws." *ACS Omega* 6 (49): 33436–33442.



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Figuerola, L., M. Blinder, C. Grincavitch, A. Jelinek, E. Mann, L. Merva, L. Metz, A. Zhao, R. Irwin, S. McArt, and L. Adler. 2019. "Bee pathogen transmission dynamics: Deposition, persistence and acquisition on flowers." *Proceedings of the Royal Society B*, 286: 20190603.

*Resume updated July 2025*



LM-2: Company  
response to Staff  
discovery request  
STF-PIA-4-3



**Georgia Power Company**  
**Docket Nos. 56298 & 56310**  
**Certification of 2029-2031 All-Source RFP & 2028-2031 Supplemental Resources**  
**STF-PIA Data Request Set No. 4**

**STF-PIA-4-3**

Question:

What specific capacity resources will stand behind 50 MW of the Mississippi Power PPA, why will only 50 MW be available when 750 MW had previously been available, and why is the PPA only for one year?

Response:

As discussed in STF-PIA-3-48(c), due to economic development considerations in Mississippi, Mississippi Power Company (“MPC”) only offered to extend the existing 750 MW power purchase agreement (“PPA”) for 50 MW in 2029 at this time. As in the existing five-year (2024-2028) MPC PPA approved in Georgia Power’s 2023 Integrated Resource Plan (“IRP”) Update in Docket No. 55378, this extension is for 50 MW of MPC capacity in the Southern Company system pool and is not associated with specific capacity resources.

Georgia Power and MPC will continue to monitor availability of additional MPC capacity in 2029 and beyond, if Georgia Power has additional capacity needs in the future beyond what could be procured through an RFP framework. The Company would bring any further extensions to the Commission for certification if and when identified.



LM-3: Company  
response to Staff  
discovery request  
STF-PIA-1-9



**Georgia Power Company**  
**Docket No. 56298 & 56310**  
**Certification of 2029-2031 All-Source RFP & 2028-2031 Supplemental Resources**  
**STF-PIA Data Request Set No. 1**

**STF-PIA-1-9**

Question:

ELCC: Refer to the Company's load and resource balance tables provided in "2029-2031 All-Source RFP Certification Application Needs Charts Workpaper.xlsx"

- a. Explain how the Company is assigning capacity contributions for existing and planned solar resources.
- b. For each resource provide the nameplate and ELCC % assumed on a summer and winter basis.
- c. Please explain if the Company is capturing average or incremental/marginal ELCCs in its Load and Resource Tables.
- d. Please provide the Company's latest ELCC studies and indicate if the ELCCs in the Load and Resource Table reflect the latest study. If not, explain why not and provide the ELCC study that the Company relied on in developing the Load and Resource Table.

Response:

- a. Please see the Company's response to STF-PIA-1-17.
- b. Please see STF-PIA-1-9 Attachment for planning capacities, nameplate capacities, and economic load carrying capability ("ELCC") percentages for each resource identified in "2029-2031 All-Source RFP Certification Application Needs Charts Workpaper.xlsx." Note that nameplate capacity is not appropriate for resource adequacy planning and results in overstated reserve margins because it does not account for the ELCC or planning capacity of each resource.
- c. The values captured in the Load and Resource Tables reflect incremental ELCCs.
- d. Please see the attachments to STF-PIA-1-17. Yes, the ELCCs in the Load and Resource Table reflect the latest study. The ELCC tranches for the resources requested for certification exhibit differences, as explained in response to STF-PIA-1-4 Subpart (b).



Georgia Power Load vs. Planning Capacity MG0 (Winter) with February 2025 Load Forecast, 2025 IRP Approvals, CARES 2023 RFP, Winter 2027\_2028 BESS RFP, and 2029-2031 All-Source RFP

Year	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044
February 2025 Load Forecast Peak Demand (MW), (A)	16,236	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
Owned Generating Capacity (MW), (B)	14,306	15,164	16,545	16,801	17,272	17,273	17,218	17,194	17,194	17,194	16,724	12,759	12,759	12,759	12,110	12,110	12,110	12,110	12,110	12,110
Purchased Generating Capacity (MW), (B,C)	5,913	6,012	6,242	6,503	5,723	5,758	3,806	3,806	3,751	3,747	2,430	1,849	1,782	1,432	1,432	1,072	1,052	1,049	1,047	1,047
Dispatchable DSOs (MW), (B)	649	652	656	656	659	661	665	667	670	673	675	676	681	703	711	720	728	737	748	758
2025 IRP Approvals, Excluding Extensions (MW), (B,D)	0	110	110	110	339	411	495	599	608	617	617	431	431	431	431	431	431	431	431	431
CARES 2023 RFP (MW), (B)	0	0	0	0	0	0	53	53	53	53	53	53	53	53	53	53	53	53	53	53
Winter 2027_2028 BESS RFP (MW), (B)	0	0	0	180	180	180	180	180	180	180	180	180	180	180	180	180	180	180	180	180
2029-2031 All-Source RFP (MW), (B,E)	0	0	0	0	2,075	4,221	7,844	7,844	7,844	7,844	7,844	7,844	7,844	7,844	7,844	7,844	7,757	7,757	7,757	7,757
Supplemental Resources (MW), (B,E)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Incremental Yates CT Capacity from FT Flexibility (MW)	0	0	0	0	253	253	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Owned Generating Capacity after 2025 IRP Approvals & RFPs (MW), (B)	14,306	15,216	16,597	17,033	19,741	21,959	24,433	24,462	24,471	24,481	24,011	19,859	19,859	19,859	19,210	19,210	19,210	19,210	19,210	19,210
Purchased Generating Capacity after 2025 IRP Approvals & RFPs (MW), (B,C)	5,913	6,012	6,242	6,503	6,043	6,078	5,105	5,155	5,100	5,096	3,780	3,198	3,131	2,782	2,782	2,422	2,315	2,312	2,309	2,309
Dispatchable DSOs after 2025 IRP Approvals & RFPs (MW), (B)	649	710	714	714	717	719	723	725	728	731	733	734	739	761	769	778	786	795	806	816
Total Capacity (MW), (B)	20,868	21,939	23,553	24,250	26,501	28,757	30,261	30,342	30,299	30,308	28,523	23,791	23,729	23,401	22,761	22,410	22,311	22,318	22,326	22,335
Capacity Required to Meet GPC Target (MW), (F)	(637)	(1,068)	(1,364)	152	648	672	734	1,679	2,435	2,772	4,792	9,627	9,961	10,598	11,711	12,442	13,005	13,477	13,999	14,512
GPC Reserve Margin (%)	28.5%	31.0%	32.3%	24.4%	22.1%	22.3%	22.2%	18.6%	15.8%	14.6%	7.1%	-10.9%	-11.9%	-13.9%	-17.4%	-19.5%	-20.9%	-22.0%	-23.1%	-24.1%

Notes (A) Territorial Load requirements less non-dispatchable DSOs.  
(B) Values stated in effective load carrying capability ("ELCC") terms.  
(C) Includes territorial and imported power purchases.  
(D) Excludes requests to extend Plant Scherer Unit 3 and Plant Gaston Units 1-4 and A beyond 12/31/2028. These extensions are already included in Owned Generating Capacity.  
(E) ELCCs are estimated at the resource level based on projected commercial operation dates.  
(F) Does not consider planning reserve sharing. Reflects GPC's Target Reserve Margin, resulting from a System Target Reserve Margin of 25.50% (2025-2027) and 26% (2028 and beyond).

Existing Capability

	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044
Owned Generating Capacity (MW)	14,306	15,164	16,545	16,801	17,272	17,273	17,218	17,194	17,194	17,194	16,724	12,759	12,759	12,759	12,110	12,110	12,110	12,110	12,110	12,110
Nuclear	3,049	3,049	3,049	3,049	3,049	3,049	3,049	3,049	3,049	3,049	3,049	3,049	3,049	3,049	3,049	3,049	3,049	3,049	3,049	3,049
HATCH1	451	451	451	451	451	451	451	451	451	451	451	451	451	451	451	451	451	451	451	451
HATCH2	454	454	454	454	454	454	454	454	454	454	454	454	454	454	454	454	454	454	454	454
VOGTLE1	560	560	560	560	560	560	560	560	560	560	560	560	560	560	560	560	560	560	560	560
VOGTLE2	563	563	563	563	563	563	563	563	563	563	563	563	563	563	563	563	563	563	563	563
VOGTLE3	510	510	510	510	510	510	510	510	510	510	510	510	510	510	510	510	510	510	510	510
VOGTLE4	510	510	510	510	510	510	510	510	510	510	510	510	510	510	510	510	510	510	510	510
Coal	4,045	4,045	4,045	4,045	4,045	4,045	3,990	3,965	3,965	3,965	3,965	-	-	-	-	-	-	-	-	-
BOWEN1	740	740	740	740	740	740	740	740	740	740	740	-	-	-	-	-	-	-	-	-
BOWEN2	760	760	760	760	760	760	760	760	760	760	760	-	-	-	-	-	-	-	-	-
BOWEN3	950	950	950	950	950	950	950	950	950	950	950	-	-	-	-	-	-	-	-	-
BOWEN4	910	910	910	910	910	910	910	910	910	910	910	-	-	-	-	-	-	-	-	-
SCHERER1	75	75	75	75	75	75	75	75	75	75	75	-	-	-	-	-	-	-	-	-
SCHERER2	72	72	72	72	72	72	72	72	72	72	72	-	-	-	-	-	-	-	-	-
SCHERER3	537	537	537	537	537	537	482	458	458	458	458	-	-	-	-	-	-	-	-	-
WANSLEY1	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
WANSLEY2	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Combined Cycle	4,169	4,169	4,169	4,169	4,169	4,169	4,169	4,169	4,169	4,169	4,169	4,169	4,169	4,169	4,169	4,169	4,169	4,169	4,169	4,169
MCDONOUGH4	934	934	934	934	934	934	934	934	934	934	934	934	934	934	934	934	934	934	934	934
MCDONOUGH5	928	928	928	928	928	928	928	928	928	928	928	928	928	928	928	928	928	928	928	928



[illegible]



[illegible]



[illegible]



REDI 1400 MW - US2: HICKORY PARK	20	20	20	20	20	20	20	20	20	20	20	20	20	20	20	20	20	20	20	20
REDI 1400 MW - US2: QUITMAN II	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15
REDI CS2	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
SANTA ROSA	-	-	230	230	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
SUPERIOR- WASTE MANAGEMENT	6	6	6	6	6	6	6	6	6	6	6	6	6	6	-	-	-	-	-	-
WALTON COUNTY	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
WANSLEY 6	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
WANSLEY 7	622	622	622	622	622	622	622	622	622	622	-	-	-	-	-	-	-	-	-	-
WASHINGTON COUNTY	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Dispatchable DSOs (MW)	649	652	656	656	659	661	665	667	670	673	675	676	681	703	711	720	728	737	748	758
CvRLevel1	200	202	204	204	205	207	209	210	211	212	213	214	217	227	232	236	240	245	250	255
CvRLevel2	200	202	204	204	205	207	209	210	211	212	213	214	217	227	232	236	240	245	250	255
DERCustomerProgram	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
DPEC	92	92	92	92	92	92	92	92	92	92	92	92	92	92	92	92	92	92	92	92
RTPeDA	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3
RTPeHA	124	124	124	124	124	124	124	124	124	124	124	124	124	124	124	124	124	124	124	124
Temp Check	29	29	29	29	29	29	29	29	29	29	29	29	29	29	29	29	29	29	29	29
Energy Storage	-	-	812	825	825	825	825	825	825	825	825	825	825	825	825	825	825	825	825	825
2019 IRP BESS DEMO	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2019 IRP BESS DEMO - FORT STEWART 4 HR BESS	-	-	-	13	13	13	13	13	13	13	13	13	13	13	13	13	13	13	13	13
2022 IRP MCGRAU FORD 2 HR BATTERY	-	-	265	265	265	265	265	265	265	265	265	265	265	265	265	265	265	265	265	265
2023 IRP UPDATE - HAMMOND	-	-	58	58	58	58	58	58	58	58	58	58	58	58	58	58	58	58	58	58
2023 IRP Update - MCGRAU FORD PHASE 2	-	-	265	265	265	265	265	265	265	265	265	265	265	265	265	265	265	265	265	265
2023 IRP UPDATE - MOODY AFB	-	-	45	45	45	45	45	45	45	45	45	45	45	45	45	45	45	45	45	45
2023 IRP UPDATE - ROBINS AFB	-	-	115	115	115	115	115	115	115	115	115	115	115	115	115	115	115	115	115	115
MOSSY BRANCH	-	-	65	65	65	65	65	65	65	65	65	65	65	65	65	65	65	65	65	65
2025 IRP Approvals Projected Timing & Capacities - Extensions are Above	-	110	110	110	339	411	495	599	608	617	617	431	431	431	431	431	431	431	431	431
SCHERER3 WHOLESALE-TO-RETAIL	-	52	52	52	52	107	162	187	187	187	187	-	-	-	-	-	-	-	-	-
MCINTOSH 1A UPRATE	-	-	-	-	-	9	9	9	9	9	9	9	9	9	9	9	9	9	9	9
MCINTOSH 2A UPRATE	-	-	-	-	9	9	9	9	9	9	9	9	9	9	9	9	9	9	9	9
MCINTOSH 3A UPRATE	-	-	-	-	-	-	-	9	9	9	9	9	9	9	9	9	9	9	9	9
MCINTOSH 4A UPRATE	-	-	-	-	-	-	-	-	-	9	9	9	9	9	9	9	9	9	9	9
MCINTOSH 5A UPRATE	-	-	-	-	-	-	-	-	9	9	9	9	9	9	9	9	9	9	9	9
MCINTOSH 6A UPRATE	-	-	-	-	9	9	9	9	9	9	9	9	9	9	9	9	9	9	9	9
MCINTOSH 7A UPRATE	-	-	-	-	9	9	9	9	9	9	9	9	9	9	9	9	9	9	9	9
MCINTOSH 8A UPRATE	-	-	-	-	-	-	9	9	9	9	9	9	9	9	9	9	9	9	9	9
MCINTOSH 10 UPRATE	-	-	-	-	97	97	97	97	97	97	97	97	97	97	97	97	97	97	97	97
MCINTOSH 11 UPRATE	-	-	-	-	97	97	97	97	97	97	97	97	97	97	97	97	97	97	97	97
VOGTLE 1 UPRATE	-	-	-	-	-	7	27	27	27	27	27	27	27	27	27	27	27	27	27	27
VOGTLE 2 UPRATE	-	-	-	-	7	7	7	27	27	27	27	27	27	27	27	27	27	27	27	27
Temp Check Increase	-	58	58	58	58	58	58	58	58	58	58	58	58	58	58	58	58	58	58	58
2026 DG RFP (COA 2028)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2027 DG RFP (COA 2029)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
CARES 2026 US RFP	-	-	-	-	-	-	-	50	50	50	50	50	50	50	50	50	50	50	50	50
Extensions for Reference Only - Extensions Included Above	-	-	-	-	1,007	1,007	952	928	928	928	458	-	-	-	-	-	-	-	-	-
SCHERER3	-	-	-	-	537	537	482	458	458	458	458	-	-	-	-	-	-	-	-	-
GASTON 1 GAS	-	-	-	-	127	127	127	127	127	127	-	-	-	-	-	-	-	-	-	-
GASTON 2 GAS	-	-	-	-	128	128	128	128	128	128	-	-	-	-	-	-	-	-	-	-
GASTON 3 GAS	-	-	-	-	102	102	102	102	102	102	-	-	-	-	-	-	-	-	-	-
GASTON 4 GAS	-	-	-	-	103	103	103	103	103	103	-	-	-	-	-	-	-	-	-	-
GASTON A	-	-	-	-	10	10	10	10	10	10	-	-	-	-	-	-	-	-	-	-
2025 IRP Approvals Total for Reference Only	-	110	110	110	1,346	1,418	1,447	1,526	1,536	1,545	1,075	431	431	431	431	431	431	431	431	431
CARES 2023 RFP	-	-	-	-	-	-	53	53	53	53	53	53	53	53	53	53	53	53	53	53
GA Solar 5, LLC (Old Hickory Solar)	-	-	-	-	-	-	13	13	13	13	13	13	13	13	13	13	13	13	13	13
Wilsomville Solar, LLC	-	-	-	-	-	-	10	10	10	10	10	10	10	10	10	10	10	10	10	10
Shellar Dry Creek Solar, LLC	-	-	-	-	-	-	10	10	10	10	10	10	10	10	10	10	10	10	10	10
Shellar Shamrock Solar, LLC	-	-	-	-	-	-	11	11	11	11	11	11	11	11	11	11	11	11	11	11
Beaver Creek Solar1, LLC	-	-	-	-	-	-	9	9	9	9	9	9	9	9	9	9	9	9	9	9
Winter 2027_2028 BESS RFP	-	-	-	180	180	180	180	180	180	180	180	180	180	180	180	180	180	180	180	180
Twigg County BESS	-	-	-	180	180	180	180	180	180	180	180	180	180	180	180	180	180	180	180	180



2029-2031 All-Source RFP	-	-	-	-	2,075	4,221	7,844	7,844	7,844	7,844	7,844	7,844	7,844	7,844	7,844	7,844	7,757	7,757	7,757	7,757
Mid-GA PPA (CC)	-	-	-	-	320	320	320	320	320	320	320	320	320	320	320	320	320	320	320	320
Plant Dahlberg PPA (CT)	-	-	-	-	-	-	87	87	87	87	87	87	87	87	87	87	-	-	-	-
Plant Harris PPA (CC)	-	-	-	-	-	-	683	683	683	683	683	683	683	683	683	683	683	683	683	683
Sandersville PPA (CT)	-	-	-	-	-	-	156	156	156	156	156	156	156	156	156	156	156	156	156	156
Laurens County (ESS+Solar)	-	-	-	-	160	160	160	160	160	160	160	160	160	160	160	160	160	160	160	160
Plant Mitchell (ESS+Solar)	-	-	-	-	120	120	120	120	120	120	120	120	120	120	120	120	120	120	120	120
Bowen BESS Phase 1	-	-	-	-	250	250	250	250	250	250	250	250	250	250	250	250	250	250	250	250
South Hall BESS	-	-	-	-	200	200	200	200	200	200	200	200	200	200	200	200	200	200	200	200
Wansley BESS	-	-	-	-	500	500	500	500	500	500	500	500	500	500	500	500	500	500	500	500
Yates BESS Phase 1	-	-	-	-	320	320	320	320	320	320	320	320	320	320	320	320	320	320	320	320
Yates BESS Phase 2	-	-	-	-	205	205	205	205	205	205	205	205	205	205	205	205	205	205	205	205
Bowen BESS Phase 2	-	-	-	-	-	200	200	200	200	200	200	200	200	200	200	200	200	200	200	200
Thoms on BESS	-	-	-	-	-	400	400	400	400	400	400	400	400	400	400	400	400	400	400	400
Hammond BESS Phase 2	-	-	-	-	-	-	154	154	154	154	154	154	154	154	154	154	154	154	154	154
McIntosh BESS	-	-	-	-	-	-	200	200	200	200	200	200	200	200	200	200	200	200	200	200
Bowen Unit 7 (CC)	-	-	-	-	-	780	780	780	780	780	780	780	780	780	780	780	780	780	780	780
Bowen Unit 8 (CC)	-	-	-	-	-	-	780	780	780	780	780	780	780	780	780	780	780	780	780	780
Wansley Unit 10 (CC)	-	-	-	-	-	765	765	765	765	765	765	765	765	765	765	765	765	765	765	765
Wansley Unit 11 (CC)	-	-	-	-	-	-	765	765	765	765	765	765	765	765	765	765	765	765	765	765
McIntosh Unit 12 (CC)	-	-	-	-	-	-	797	797	797	797	797	797	797	797	797	797	797	797	797	797
Supplemental Resources (MW)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Decatur BESS	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Dougherty BESS	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Wadley BESS	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Washington BESS	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
White Oak BESS	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
White Pine BESS	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
MPC PPA Extension	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Tenaska PPA (CT)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Incremental Yates CT Capacity from FT Flexibility (MW)	-	-	-	-	253	253	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Yates CT	-	-	-	-	253	253	-	-	-	-	-	-	-	-	-	-	-	-	-	-



Georgia Power Load vs. Nameplate Capacity MG0 (Winter) with February 2025 Load Forecast, 2025 IRP Approvals, CARES 2023 RFP, Winter 2027\_2028 BESS RFP, and 2029-2031 All-Source RFP

Year	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044
February 2025 Load Forecast Peak Demand (MW), (A)	16,236	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
Owned Generating Capacity (MW), (B)	14,616	15,474	16,873	17,130	17,602	17,625	17,570	17,546	17,546	17,546	17,076	13,111	13,111	13,109	12,460	12,460	12,460	12,460	12,460	12,460
Purchased Generating Capacity (MW), (B,C)	8,779	9,344	9,344	9,604	8,824	8,894	9,110	9,110	9,054	9,036	7,697	6,852	6,723	6,372	6,372	6,011	5,931	5,918	5,904	5,902
Dispatchable DSOs (MW), (B)	793	797	800	801	803	806	810	812	815	818	819	821	826	848	856	865	873	883	893	903
2025 IRP Approvals, Excluding Extensions (MW), (B,D)	0	117	117	117	396	518	602	1,656	1,665	1,674	1,674	1,488	1,488	1,488	1,488	1,488	1,488	1,488	1,488	1,488
CARES 2023 RFP (MW), (B)	0	0	0	0	0	0	1,068	1,068	1,068	1,068	1,068	1,068	1,068	1,068	1,068	1,068	1,068	1,068	1,068	1,068
Winter 2027_2028 BESS RFP (MW), (B)	0	0	0	200	200	200	200	200	200	200	200	200	200	200	200	200	200	200	200	200
2029-2031 All-Source RFP (MW), (B,E)	0	0	0	0	2,240	4,536	8,247	8,247	8,247	8,247	8,247	8,247	8,247	8,247	8,247	8,247	8,160	8,160	8,160	8,160
Supplemental Resources (MW), (B,E)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Incremental Yates CT Capacity from FT Flexibility (MW)	0	0	0	0	253	253	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Owned Generating Capacity after 2025 IRP Approvals & RFPs (MW), (B)	14,616	15,526	16,925	17,382	20,256	22,647	25,208	25,238	25,247	25,256	24,787	20,634	20,634	20,632	19,984	19,984	19,984	19,984	19,984	19,984
Purchased Generating Capacity after 2025 IRP Approvals & RFPs (MW), (B,C)	8,779	9,344	9,344	9,604	9,194	9,314	11,524	12,524	12,468	12,450	11,111	10,266	10,137	9,786	9,786	9,425	9,258	9,245	9,231	9,229
Dispatchable DSOs after 2025 IRP Approvals & RFPs (MW), (B)	793	862	865	866	868	871	875	877	880	883	884	886	891	913	921	930	938	948	958	968
Total Capacity (MW), (B)	24,187	25,732	27,134	27,852	30,318	32,832	37,607	38,638	38,595	38,589	36,782	31,786	31,663	31,331	30,691	30,339	30,180	30,176	30,174	30,182
Capacity Required to Meet GPC Target (MW), (F)	(3,956)	(4,861)	(4,945)	(3,450)	(3,169)	(3,403)	(6,612)	(6,616)	(5,860)	(5,509)	(3,467)	1,632	2,027	2,668	3,781	4,513	5,135	5,618	6,150	6,665
GPC Reserve Margin (%), (G)	49.0%	53.6%	52.4%	42.8%	39.7%	39.6%	51.8%	51.0%	47.5%	46.0%	38.2%	19.0%	17.6%	15.3%	11.4%	8.9%	6.9%	5.5%	3.9%	2.5%

Notes (A) Territorial Load requirements less non-dispatchable DSOs.  
(B) Values stated in nameplate capacity for supply-side resources and in program capacity for demand-side resources.  
(C) Includes territorial and imported power purchases.  
(D) Excludes requests to extend Plant Scherer Unit 3 and Plant Gaston Units 1-4 and A beyond 12/31/2028. These extensions are already included in Owned Generating Capacity.  
(E) N/A  
(F) Does not consider planning reserve sharing. Reflects GPC's Target Reserve Margin, resulting from a System Target Reserve Margin of 25.50% (2025-2027) and 26% (2028 and beyond).  
(G) Nameplate capacity is not appropriate for resource adequacy planning and results in overstated reserve margins because it does not account for the effective load carrying capability or planning capacity of each resource.

Existing Capability

	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044
Owned Generating Capacity (MW)	14,616	15,474	16,873	17,130	17,602	17,625	17,570	17,546	17,546	17,546	17,076	13,111	13,111	13,109	12,460	12,460	12,460	12,460	12,460	12,460
Nuclear	3,049	3,049	3,049	3,049	3,049	3,049	3,049	3,049	3,049	3,049	3,049	3,049	3,049	3,049	3,049	3,049	3,049	3,049	3,049	3,049
HATCH1	451	451	451	451	451	451	451	451	451	451	451	451	451	451	451	451	451	451	451	451
HATCH2	454	454	454	454	454	454	454	454	454	454	454	454	454	454	454	454	454	454	454	454
VOGTLE1	560	560	560	560	560	560	560	560	560	560	560	560	560	560	560	560	560	560	560	560
VOGTLE2	563	563	563	563	563	563	563	563	563	563	563	563	563	563	563	563	563	563	563	563
VOGTLE3	510	510	510	510	510	510	510	510	510	510	510	510	510	510	510	510	510	510	510	510
VOGTLE4	510	510	510	510	510	510	510	510	510	510	510	510	510	510	510	510	510	510	510	510
Coal	4,045	4,045	4,045	4,045	4,045	4,045	3,990	3,965	3,965	3,965	3,965	-	-	-	-	-	-	-	-	-
BOWEN1	740	740	740	740	740	740	740	740	740	740	740	-	-	-	-	-	-	-	-	-
BOWEN2	760	760	760	760	760	760	760	760	760	760	760	-	-	-	-	-	-	-	-	-
BOWEN3	950	950	950	950	950	950	950	950	950	950	950	-	-	-	-	-	-	-	-	-
BOWEN4	910	910	910	910	910	910	910	910	910	910	910	-	-	-	-	-	-	-	-	-
SCHERER1	75	75	75	75	75	75	75	75	75	75	75	-	-	-	-	-	-	-	-	-
SCHERER2	72	72	72	72	72	72	72	72	72	72	72	-	-	-	-	-	-	-	-	-
SCHERER3	537	537	537	537	537	537	482	458	458	458	458	-	-	-	-	-	-	-	-	-
WANSLEY1	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
WANSLEY2	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Combined Cycle	4,169	4,169	4,169	4,169	4,169	4,169	4,169	4,169	4,169	4,169	4,169	4,169	4,169	4,169	4,169	4,169	4,169	4,169	4,169	4,169
MCDONOUGH4	934	934	934	934	934	934	934	934	934	934	934	934	934	934	934	934	934	934	934	934
MCDONOUGH5	928	928	928	928	928	928	928	928	928	928	928	928	928	928	928	928	928	928	928	928



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[illegible]



REDI 1400 MW - US2: HICKORY PARK	196	196	196	196	196	196	196	196	196	196	196	196	196	196	196	196	196	196	196	196	196
REDI 1400 MW - US2: QUITMAN II	150	150	150	150	150	150	150	150	150	150	150	150	150	150	150	150	150	150	150	150	150
REDI CS2	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3
SANTA ROSA	-	230	230	230	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
SUPERIOR- WASTE MANAGEMENT	6	6	6	6	6	6	6	6	6	6	6	6	6	6	-	-	-	-	-	-	-
WALTON COUNTY	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
WANSLEY 6	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
WANSLEY 7	622	622	622	622	622	622	622	622	622	622	-	-	-	-	-	-	-	-	-	-	-
WASHINGTON COUNTY	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Dispatchable DSOs (MW)	793	797	800	801	803	806	810	812	815	818	819	821	826	848	856	865	873	883	893	903	
CvRLLevel 1	203	205	207	207	208	209	211	212	214	215	216	217	219	230	235	239	243	248	253	258	
CvRLLevel 2	203	205	207	207	208	209	211	212	214	215	216	217	219	230	235	239	243	248	253	258	
DERCustomerProgram	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
DPEC	226	226	226	226	226	226	226	226	226	226	226	226	226	226	226	226	226	226	226	226	
RTPeDA	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	
RTPeHA	126	126	126	126	126	126	126	126	126	126	126	126	126	126	126	126	126	126	126	126	
Temp Check	33	33	33	33	33	33	33	33	33	33	33	33	33	33	33	33	33	33	33	33	
Energy Storage	-	-	830	845	845	845	845	845	845	845	845	845	845	843	843	843	843	843	843	843	
2019 IRP BESS DEMO	-	-	-	2	2	2	2	2	2	2	2	2	2	-	-	-	-	-	-	-	
2019 IRP BESS DEMO - FORT STEWART 4 HR BESS	-	-	-	13	13	13	13	13	13	13	13	13	13	13	13	13	13	13	13	13	
2022 IRP MCGRAU FORD 2 HR BATTERY	-	-	265	265	265	265	265	265	265	265	265	265	265	265	265	265	265	265	265	265	
2023 IRP UPDATE - HAMMOND	-	-	58	58	58	58	58	58	58	58	58	58	58	58	58	58	58	58	58	58	
2023 IRP Update - MCGRAU FORD PHASE 2	-	-	265	265	265	265	265	265	265	265	265	265	265	265	265	265	265	265	265	265	
2023 IRP UPDATE - MOODY AFB	-	-	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	
2023 IRP UPDATE - ROBINS AFB	-	-	128	128	128	128	128	128	128	128	128	128	128	128	128	128	128	128	128	128	
MOSSY BRANCH	-	-	65	65	65	65	65	65	65	65	65	65	65	65	65	65	65	65	65	65	
2025 IRP Approvals Projected Timing & Capacities - Extensions are Above	-	117	117	117	396	518	602	1,656	1,665	1,674	1,674	1,488	1,488	1,488	1,488	1,488	1,488	1,488	1,488	1,488	
SCHERER3 WHOLESALE E-TO RETAIL	-	52	52	52	52	107	162	187	187	187	187	187	-	-	-	-	-	-	-	-	
MCINTOSH 1A UPRATE	-	-	-	-	-	9	9	9	9	9	9	9	9	9	9	9	9	9	9	9	
MCINTOSH 2A UPRATE	-	-	-	-	9	9	9	9	9	9	9	9	9	9	9	9	9	9	9	9	
MCINTOSH 3A UPRATE	-	-	-	-	-	-	-	9	9	9	9	9	9	9	9	9	9	9	9	9	
MCINTOSH 4A UPRATE	-	-	-	-	-	-	-	-	9	9	9	9	9	9	9	9	9	9	9	9	
MCINTOSH 5A UPRATE	-	-	-	-	-	-	-	-	9	9	9	9	9	9	9	9	9	9	9	9	
MCINTOSH 6A UPRATE	-	-	-	-	9	9	9	9	9	9	9	9	9	9	9	9	9	9	9	9	
MCINTOSH 7A UPRATE	-	-	-	-	9	9	9	9	9	9	9	9	9	9	9	9	9	9	9	9	
MCINTOSH 8A UPRATE	-	-	-	-	-	-	9	9	9	9	9	9	9	9	9	9	9	9	9	9	
MCINTOSH 10 UPRATE	-	-	-	-	97	97	97	97	97	97	97	97	97	97	97	97	97	97	97	97	
MCINTOSH 11 UPRATE	-	-	-	-	97	97	97	97	97	97	97	97	97	97	97	97	97	97	97	97	
VOGTLE 1 UPRATE	-	-	-	-	-	7	27	27	27	27	27	27	27	27	27	27	27	27	27	27	
VOGTLE 2 UPRATE	-	-	-	-	7	7	7	27	27	27	27	27	27	27	27	27	27	27	27	27	
Temp Check Increase	-	65	65	65	65	65	65	65	65	65	65	65	65	65	65	65	65	65	65	65	
2026 DG RFP (COA 2028)	-	-	-	-	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	
2027 DG RFP (COA 2029)	-	-	-	-	-	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	
CARES 2026 US RFP	-	-	-	-	-	-	-	1,000	1,000	1,000	1,000	1,000	1,000	1,000	1,000	1,000	1,000	1,000	1,000	1,000	
Extensions for Reference Only - Extensions Included Above	-	-	-	-	1,007	1,007	952	928	928	928	458	-	-	-	-	-	-	-	-	-	
SCHERER3	-	-	-	-	537	537	482	458	458	458	458	-	-	-	-	-	-	-	-	-	
GASTON 1 GAS	-	-	-	-	127	127	127	127	127	127	-	-	-	-	-	-	-	-	-	-	
GASTON 2 GAS	-	-	-	-	128	128	128	128	128	128	-	-	-	-	-	-	-	-	-	-	
GASTON 3 GAS	-	-	-	-	102	102	102	102	102	102	-	-	-	-	-	-	-	-	-	-	
GASTON 4 GAS	-	-	-	-	103	103	103	103	103	103	-	-	-	-	-	-	-	-	-	-	
GASTON A	-	-	-	-	10	10	10	10	10	10	-	-	-	-	-	-	-	-	-	-	
2025 IRP Approvals Total for Reference Only	-	117	117	117	1,403	1,525	1,554	2,583	2,593	2,602	2,132	1,488	1,488	1,488	1,488	1,488	1,488	1,488	1,488	1,488	
CARES 2023 RFP	-	-	-	-	-	-	1,068	1,068	1,068	1,068	1,068	1,068	1,068	1,068	1,068	1,068	1,068	1,068	1,068	1,068	
GA Solar 5, LLC (Old Hickory Solar)	-	-	-	-	-	-	260	260	260	260	260	260	260	260	260	260	260	260	260	260	
Wilsomville Solar, LLC	-	-	-	-	-	-	200	200	200	200	200	200	200	200	200	200	200	200	200	200	
Stellar Dry Creek Solar, LLC	-	-	-	-	-	-	200	200	200	200	200	200	200	200	200	200	200	200	200	200	
Stellar Shamrock Solar, LLC	-	-	-	-	-	-	225	225	225	225	225	225	225	225	225	225	225	225	225	225	
Beaver Creek Solar1, LLC	-	-	-	-	-	-	183	183	183	183	183	183	183	183	183	183	183	183	183	183	
Winter 2027_2028 BESS RFP	-	-	-	200	200	200	200	200	200	200	200	200	200	200	200	200	200	200	200	200	
Twigg County BESS	-	-	-	200	200	200	200	200	200	200	200	200	200	200	200	200	200	200	200	200	



2029-2031 All-Source RFP	-	-	-	-	2,240	4,536	8,247	8,247	8,247	8,247	8,247	8,247	8,247	8,247	8,247	8,247	8,160	8,160	8,160	8,160
Mid-GA PPA (CC)	-	-	-	-	320	320	320	320	320	320	320	320	320	320	320	320	320	320	320	320
Plant Dahlberg PPA (CT)	-	-	-	-	-	-	87	87	87	87	87	87	87	87	87	87	-	-	-	-
Plant Harris PPA (CC)	-	-	-	-	-	-	683	683	683	683	683	683	683	683	683	683	683	683	683	683
Sandersville PPA (CT)	-	-	-	-	-	-	156	156	156	156	156	156	156	156	156	156	156	156	156	156
Laurens County (ESS+Solar)	-	-	-	-	200	200	200	200	200	200	200	200	200	200	200	200	200	200	200	200
Plant Mitchell (ESS+Solar)	-	-	-	-	150	150	150	150	150	150	150	150	150	150	150	150	150	150	150	150
Bowen BESS Phase 1	-	-	-	-	250	250	250	250	250	250	250	250	250	250	250	250	250	250	250	250
South Hall BESS	-	-	-	-	250	250	250	250	250	250	250	250	250	250	250	250	250	250	250	250
Wansley BESS	-	-	-	-	500	500	500	500	500	500	500	500	500	500	500	500	500	500	500	500
Yates BESS Phase 1	-	-	-	-	320	320	320	320	320	320	320	320	320	320	320	320	320	320	320	320
Yates BESS Phase 2	-	-	-	-	250	250	250	250	250	250	250	250	250	250	250	250	250	250	250	250
Bowen BESS Phase 2	-	-	-	-	-	250	250	250	250	250	250	250	250	250	250	250	250	250	250	250
Thoms on BESS	-	-	-	-	-	500	500	500	500	500	500	500	500	500	500	500	500	500	500	500
Hammond BESS Phase 2	-	-	-	-	-	-	193	193	193	193	193	193	193	193	193	193	193	193	193	193
McIntosh BESS	-	-	-	-	-	-	250	250	250	250	250	250	250	250	250	250	250	250	250	250
Bowen Unit 7 (CC)	-	-	-	-	-	780	780	780	780	780	780	780	780	780	780	780	780	780	780	780
Bowen Unit 8 (CC)	-	-	-	-	-	-	780	780	780	780	780	780	780	780	780	780	780	780	780	780
Wansley Unit 10 (CC)	-	-	-	-	-	765	765	765	765	765	765	765	765	765	765	765	765	765	765	765
Wansley Unit 11 (CC)	-	-	-	-	-	-	765	765	765	765	765	765	765	765	765	765	765	765	765	765
McIntosh Unit 12 (CC)	-	-	-	-	-	-	797	797	797	797	797	797	797	797	797	797	797	797	797	797
Supplemental Resources (MW)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Decatur BESS	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Dougherty BESS	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Wadley BESS	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Washington BESS	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
White Oak BESS	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
White Pine BESS	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
MPC PPA Extension	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Tenaska PPA (CT)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Incremental Yates CT Capacity from FT Flexibility (MW)	-	-	-	-	253	253	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Yates CT	-	-	-	-	253	253	-	-	-	-	-	-	-	-	-	-	-	-	-	-



Georgia Power ELCCs MG0 (Winter) with February 2025 Load Forecast, 2025 IRP Approvals, CARES 2023 RFP, Winter 2027\_2028 BESS RFP, and 2029-2031 All-Source RFP

	Year	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044
February 2025 Load Forecast Peak Demand (MW), (A)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Owned Generating Capacity (MW), (B)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Purchased Generating Capacity (MW), (B,C)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Dispatchable DSOs (MW), (B)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
2025 IRP Approvals, Excluding Extensions (MW), (B,D)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
CARES 2023 RFP (MW), (B)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Winter 2027_2028 BESS RFP (MW), (B)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
2029-2031 All-Source RFP (MW), (B,E)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Supplemental Resources (MW), (B,E)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Incremental Yates CT Capacity from FT Flexibility (MW)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Owned Generating Capacity after 2025 IRP Approvals & RFPs (MW), (B)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Purchased Generating Capacity after 2025 IRP Approvals & RFPs (MW), (B,C)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Dispatchable DSOs after 2025 IRP Approvals & RFPs (MW), (B)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Total Capacity (MW), (B)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Capacity Required to Meet GPC Target (MW), (F)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
GPC Reserve Margin (%)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Notes (A) Territorial Load requirements less non-dispatchable DSOs.  
(B) Values stated in effective load carrying capability ("ELCC") terms.  
(C) Includes territorial and imported power purchases.  
(D) Excludes requests to extend Plant Scherer Unit 3 and Plant Gaston Units 1-4 and A beyond 12/31/2028. These extensions are already included in Owned Generating Capacity.  
(E) ELCCs are estimated at the resource level based on projected commercial operation dates.  
(F) Does not consider planning reserve sharing. Reflects GPC's Target Reserve Margin, resulting from a System Target Reserve Margin of 25.50% (2025-2027) and 26% (2028 and beyond).

Existing Capability

	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044
Owned Generating Capacity (MW)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Nuclear	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
HATCH1	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
HATCH2	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
VOGTLE1	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
VOGTLE2	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
VOGTLE3	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
VOGTLE4	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
Coal	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
BOWEN1	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
BOWEN2	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
BOWEN3	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
BOWEN4	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
SCHERER1	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
SCHERER2	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
SCHERER3	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
WANSLEY1	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
WANSLEY2	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Combined Cycle	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
MCDONOUGH4	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
MCDONOUGH5	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%



[illegible]



[illegible]







REDI 1400 MW - US2: HICKORY PARK	10%	10%	10%	10%	10%	10%	10%	10%	10%	10%	10%	10%	10%	10%	10%	10%	10%	10%	10%	10%	10%	10%	10%
REDI 1400 MW - US2: QUITMAN II	10%	10%	10%	10%	10%	10%	10%	10%	10%	10%	10%	10%	10%	10%	10%	10%	10%	10%	10%	10%	10%	10%	10%
REDI CS2	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
SANTA ROSA	N/A	0%	100%	100%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
SUPERIOR WASTE MANAGEMENT	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
WALTON COUNTY	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
WANSLEY 6	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
WANSLEY 7	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
WASHINGTON COUNTY	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Dispatchable DSOs (MW)****	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
CvR Level 1	99%	99%	99%	99%	99%	99%	99%	99%	99%	99%	99%	99%	99%	99%	99%	99%	99%	99%	99%	99%	99%	99%	99%
CvR Level 2	99%	99%	99%	99%	99%	99%	99%	99%	99%	99%	99%	99%	99%	99%	99%	99%	99%	99%	99%	99%	99%	99%	99%
DER Customer Program	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
DPEC	41%	41%	41%	41%	41%	41%	41%	41%	41%	41%	41%	41%	41%	41%	41%	41%	41%	41%	41%	41%	41%	41%	41%
RTPeDA	98%	98%	98%	98%	98%	98%	98%	98%	98%	98%	98%	98%	98%	98%	98%	98%	98%	98%	98%	98%	98%	98%	98%
RTPeHA	98%	98%	98%	98%	98%	98%	98%	98%	98%	98%	98%	98%	98%	98%	98%	98%	98%	98%	98%	98%	98%	98%	98%
Temp Check	89%	89%	89%	89%	89%	89%	89%	89%	89%	89%	89%	89%	89%	89%	89%	89%	89%	89%	89%	89%	89%	89%	89%
Energy Storage	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
2019 IRP BESS DEMO	N/A	N/A	N/A	N/A	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A
2019 IRP BESS DEMO - FORT STEWART 4 HR BESS	N/A	N/A	N/A	N/A	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
2022 IRP MCGRAU FORD 2 HR BATTERY	N/A	N/A	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
2023 IRP UPDATE - HAMMOND	N/A	N/A	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
2023 IRP Update - MCGRAU FORD PHASE 2	N/A	N/A	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
2023 IRP UPDATE - MOODY AFB****	N/A	N/A	90%	90%	90%	90%	90%	90%	90%	90%	90%	90%	90%	90%	90%	90%	90%	90%	90%	90%	90%	90%	90%
2023 IRP UPDATE - ROBINS AFB****	N/A	N/A	90%	90%	90%	90%	90%	90%	90%	90%	90%	90%	90%	90%	90%	90%	90%	90%	90%	90%	90%	90%	90%
MOSSY BRANCH	N/A	N/A	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
2025 IRP Approvals Projected Timing & Capacities - Extensions are Above	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
SCHERER3 WHOLESALE E-TO-RETAIL	N/A	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
MCINTOSH 1A UPRATE	N/A	N/A	N/A	N/A	N/A	N/A	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
MCINTOSH 2A UPRATE	N/A	N/A	N/A	N/A	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
MCINTOSH 3A UPRATE	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
MCINTOSH 4A UPRATE	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
MCINTOSH 5A UPRATE	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
MCINTOSH 6A UPRATE	N/A	N/A	N/A	N/A	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
MCINTOSH 7A UPRATE	N/A	N/A	N/A	N/A	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
MCINTOSH 8A UPRATE	N/A	N/A	N/A	N/A	N/A	N/A	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
MCINTOSH 10 UPRATE	N/A	N/A	N/A	N/A	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
MCINTOSH 11 UPRATE	N/A	N/A	N/A	N/A	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
VOGTLE 1 UPRATE	N/A	N/A	N/A	N/A	N/A	N/A	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
VOGTLE 2 UPRATE	N/A	N/A	N/A	N/A	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
Temp Check Increase	N/A	89%	89%	89%	89%	89%	89%	89%	89%	89%	89%	89%	89%	89%	89%	89%	89%	89%	89%	89%	89%	89%	89%
2026 DG RFP (COA 2028)	N/A	N/A	N/A	N/A	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
2027 DG RFP (COA 2029)	N/A	N/A	N/A	N/A	N/A	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
CARES 2026 US RFP	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	5%	5%	5%	5%	5%	5%	5%	5%	5%	5%	5%	5%	5%	5%	5%
Extensions for Reference Only - Extensions Included Above	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
SCHERER3	N/A	N/A	N/A	N/A	100%	100%	100%	100%	100%	100%	100%	100%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
GASTON 1 GAS	N/A	N/A	N/A	N/A	100%	100%	100%	100%	100%	100%	100%	100%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
GASTON 2 GAS	N/A	N/A	N/A	N/A	100%	100%	100%	100%	100%	100%	100%	100%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
GASTON 3 GAS	N/A	N/A	N/A	N/A	100%	100%	100%	100%	100%	100%	100%	100%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
GASTON 4 GAS	N/A	N/A	N/A	N/A	100%	100%	100%	100%	100%	100%	100%	100%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
GASTON 5A	N/A	N/A	N/A	N/A	100%	100%	100%	100%	100%	100%	100%	100%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
2025 IRP Approvals Total for Reference Only	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
CARES 2023 RFP	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
GA Solar 5, LLC (Old Hickory Solar)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	5%	5%	5%	5%	5%	5%	5%	5%	5%	5%	5%	5%	5%	5%	5%	5%
Wilsomville Solar, LLC	N/A	N/A	N/A	N/A	N/A	N/A	N/A	5%	5%	5%	5%	5%	5%	5%	5%	5%	5%	5%	5%	5%	5%	5%	5%
Stellar Dry Creek Solar, LLC	N/A	N/A	N/A	N/A	N/A	N/A	N/A	5%	5%	5%	5%	5%	5%	5%	5%	5%	5%	5%	5%	5%	5%	5%	5%
Stellar Shamrock Solar, LLC	N/A	N/A	N/A	N/A	N/A	N/A	N/A	5%	5%	5%	5%	5%	5%	5%	5%	5%	5%	5%	5%	5%	5%	5%	5%
Beaver Creek Solar 1, LLC	N/A	N/A	N/A	N/A	N/A	N/A	N/A	5%	5%	5%	5%	5%	5%	5%	5%	5%	5%	5%	5%	5%	5%	5%	5%
Winter 2027_2028 BESS RFP	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Twigg County BESS	N/A	N/A	N/A	90%	90%	90%	90%	90%	90%	90%	90%	90%	90%	90%	90%	90%	90%	90%	90%	90%	90%	90%	90%



2029-2031 All-Source RFP	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Mid-GA PPA (CC)	N/A	N/A	N/A	N/A	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
Plant Dahlberg PPA (CT)	N/A	N/A	N/A	N/A	N/A	N/A	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	N/A	N/A	N/A
Plant Harts PPA (CC)	N/A	N/A	N/A	N/A	N/A	N/A	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
Sandersville PPA (CT)	N/A	N/A	N/A	N/A	N/A	N/A	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
Laurens County (ESS+Solar)	N/A	N/A	N/A	N/A	80%	80%	80%	80%	80%	80%	80%	80%	80%	80%	80%	80%	80%	80%	80%	80%	80%
Plant Mitchell (ESS+Solar)	N/A	N/A	N/A	N/A	80%	80%	80%	80%	80%	80%	80%	80%	80%	80%	80%	80%	80%	80%	80%	80%	80%
Bowen BESS Phase 1	N/A	N/A	N/A	N/A	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
South Hall BESS	N/A	N/A	N/A	N/A	80%	80%	80%	80%	80%	80%	80%	80%	80%	80%	80%	80%	80%	80%	80%	80%	80%
Wansley BESS	N/A	N/A	N/A	N/A	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
Yates BESS Phase 1	N/A	N/A	N/A	N/A	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
Yates BESS Phase 2	N/A	N/A	N/A	N/A	82%	82%	82%	82%	82%	82%	82%	82%	82%	82%	82%	82%	82%	82%	82%	82%	82%
Bowen BESS Phase 2	N/A	N/A	N/A	N/A	N/A	80%	80%	80%	80%	80%	80%	80%	80%	80%	80%	80%	80%	80%	80%	80%	80%
Thoms on BESS	N/A	N/A	N/A	N/A	N/A	80%	80%	80%	80%	80%	80%	80%	80%	80%	80%	80%	80%	80%	80%	80%	80%
Hammond BESS Phase 2	N/A	N/A	N/A	N/A	N/A	N/A	80%	80%	80%	80%	80%	80%	80%	80%	80%	80%	80%	80%	80%	80%	80%
McIntosh BESS	N/A	N/A	N/A	N/A	N/A	N/A	80%	80%	80%	80%	80%	80%	80%	80%	80%	80%	80%	80%	80%	80%	80%
Bowen Unit 7 (CC)	N/A	N/A	N/A	N/A	N/A	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
Bowen Unit 8 (CC)	N/A	N/A	N/A	N/A	N/A	N/A	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
Wansley Unit 10 (CC)	N/A	N/A	N/A	N/A	N/A	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
Wansley Unit 11 (CC)	N/A	N/A	N/A	N/A	N/A	N/A	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
McIntosh Unit 12 (CC)	N/A	N/A	N/A	N/A	N/A	N/A	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
Supplemental Resources (MW)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Decatur BESS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Dougherty BESS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Wadley BESS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Washington BESS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
White Oak BESS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
White Pine BESS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
MPC PPA Extension	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Tenaska PPA (CT)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Incremental Yates CT Capacity from FT Flexibility (MW)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Yates CT	N/A	N/A	N/A	N/A	100%	100%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

\*Includes a 50% planning adjustment factor until the resource comes online.  
\*\*Percentage does not reflect ELCC but rather's scheduled capacity divided by nameplate capacity.  
\*\*\*Includes a 50% planning adjustment factor on the incremental capacity until it comes online.  
\*\*\*\*Includes loss expansion factor adjustment.  
\*\*\*\*\*Includes an adjustment to ensure the existing solar planning capacity plus the BESS planning capacity does not exceed the total facility interconnection capacity.



Georgia Power Load vs. Planning Capacity MG0 (Summer) with February 2025 Load Forecast, 2025 IRP Approvals, CARES 2023 RFP, Winter 2027\_2028 BESS RFP, and 2029-2031 All-Source RFP

Year	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044
February 2025 Load Forecast Peak Demand (MW), (A)	17,716	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
Owned Generating Capacity (MW), (B)	13,868	14,708	16,028	16,751	16,752	16,758	16,678	16,678	16,678	16,678	16,210	12,366	12,366	12,366	11,718	11,718	11,718	11,718	11,718	11,718
Purchased Generating Capacity (MW), (B,C)	7,410	7,522	7,522	7,446	6,981	5,055	6,082	6,082	6,026	6,011	4,294	4,166	4,008	3,783	3,783	3,474	3,422	3,412	3,407	3,404
Dispatchable DSOs (MW), (B)	729	735	739	739	742	746	751	754	759	763	766	770	777	783	789	803	813	824	835	846
2025 IRP Approvals, Excluding Extensions (MW), (B,D)	0	120	120	127	253	332	464	778	791	805	805	618	618	618	618	618	618	618	618	618
CARES 2023 RFP (MW), (B)	0	0	0	0	0	267	267	267	267	267	267	267	267	267	267	267	267	267	267	267
Winter 2027_2028 BESS RFP (MW), (B)	0	0	0	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50
2029-2031 All-Source RFP (MW), (B,E)	0	0	0	300	1,807	5,849	6,973	6,973	6,973	6,973	6,973	6,973	6,973	6,973	6,973	6,899	6,899	6,899	6,899	6,899
Supplemental Resources (MW), (B,E)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Owned Generating Capacity after 2025 IRP Approvals & RFPs (MW), (B)	13,868	14,760	16,080	16,860	18,483	21,868	22,899	22,912	22,926	22,939	22,472	18,441	18,441	18,441	17,792	17,792	17,792	17,792	17,792	17,792
Purchased Generating Capacity after 2025 IRP Approvals & RFPs (MW), (B,C)	7,410	7,522	7,522	7,746	7,291	6,374	7,547	7,847	7,791	7,776	6,059	5,931	5,773	5,548	5,548	5,165	5,113	5,103	5,098	5,095
Dispatchable DSOs after 2025 IRP Approvals & RFPs (MW), (B)	729	803	808	807	810	814	819	823	827	831	834	839	845	851	857	871	882	893	904	914
Total Capacity (MW), (B)	22,007	23,085	24,410	25,413	26,584	29,055	31,265	31,582	31,544	31,547	29,365	25,210	25,058	24,840	24,198	23,829	23,787	23,788	23,794	23,802
Capacity Required to Meet GPC Target (MW), (F)	(999)	(1,173)	(729)	763	2,441	1,828	985	1,511	2,144	2,497	4,905	9,226	9,700	10,154	11,097	11,653	12,117	12,583	13,058	13,613
GPC Reserve Margin (%)	24.2%	24.9%	22.2%	15.6%	9.1%	12.0%	15.4%	13.6%	11.5%	10.4%	2.0%	-12.8%	-14.1%	-15.5%	-18.4%	-20.0%	-21.1%	-22.1%	-23.1%	-24.2%

Notes (A) Territorial Load requirements less non-dispatchable DSOs.  
(B) Values stated in effective load carrying capability ("ELCC") terms.  
(C) Includes territorial and imported power purchases.  
(D) Excludes requests to extend Plant Scherer Unit 3 and Plant Gaston Units 1-4 and A beyond 12/31/2028. These extensions are already included in Owned Generating Capacity.  
(E) ELCCs are estimated at the resource level based on projected commercial operation dates.  
(F) Does not consider planning reserve sharing. Reflects GPC's Target Reserve Margin, resulting from a System Target Reserve Margin of 19.50% (2025-2027) and 20% (2028 and beyond).

Existing Capability

	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044
Owned Generating Capacity (MW)	13,868	14,708	16,028	16,751	16,752	16,758	16,678	16,678	16,678	16,678	16,210	12,366	12,366	12,366	11,718	11,718	11,718	11,718	11,718	11,718
Nuclear	2,980	2,980	2,980	2,980	2,980	2,980	2,980	2,980	2,980	2,980	2,980	2,980	2,980	2,980	2,980	2,980	2,980	2,980	2,980	2,980
HATCH1	439	439	439	439	439	439	439	439	439	439	439	439	439	439	439	439	439	439	439	439
HATCH2	442	442	442	442	442	442	442	442	442	442	442	442	442	442	442	442	442	442	442	442
VOGTLE1	539	539	539	539	539	539	539	539	539	539	539	539	539	539	539	539	539	539	539	539
VOGTLE2	540	540	540	540	540	540	540	540	540	540	540	540	540	540	540	540	540	540	540	540
VOGTLE3	510	510	510	510	510	510	510	510	510	510	510	510	510	510	510	510	510	510	510	510
VOGTLE4	510	510	510	510	510	510	510	510	510	510	510	510	510	510	510	510	510	510	510	510
Coal	3,924	3,924	3,924	3,924	3,924	3,924	3,844	3,844	3,844	3,844	3,844	-	-	-	-	-	-	-	-	-
BOWEN1	714	714	714	714	714	714	714	714	714	714	714	-	-	-	-	-	-	-	-	-
BOWEN2	705	705	705	705	705	705	705	705	705	705	705	-	-	-	-	-	-	-	-	-
BOWEN3	910	910	910	910	910	910	910	910	910	910	910	-	-	-	-	-	-	-	-	-
BOWEN4	910	910	910	910	910	910	910	910	910	910	910	-	-	-	-	-	-	-	-	-
SCHERER1	75	75	75	75	75	75	75	75	75	75	75	-	-	-	-	-	-	-	-	-
SCHERER2	72	72	72	72	72	72	72	72	72	72	72	-	-	-	-	-	-	-	-	-
SCHERER3	537	537	537	537	537	537	458	458	458	458	458	-	-	-	-	-	-	-	-	-
WANSLEY1	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
WANSLEY2	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Combined Cycle	3,885	3,885	3,885	3,885	3,885	3,885	3,885	3,885	3,885	3,885	3,885	3,885	3,885	3,885	3,885	3,885	3,885	3,885	3,885	3,885
MCDONOUGH4	855	855	855	855	855	855	855	855	855	855	855	855	855	855	855	855	855	855	855	855
MCDONOUGH5	850	850	850	850	850	850	850	850	850	850	850	850	850	850	850	850	850	850	850	850
MCDONOUGH6	840	840	840	840	840	840	840	840	840	840	840	840	840	840	840	840	840	840	840	840
MCINTOSH10	670	670	670	670	670	670	670	670	670	670	670	670	670	670	670	670	670	670	670	670
MCINTOSH11	670	670	670	670	670	670	670	670	670	670	670	670	670	670	670	670	670	670	670	670



Oil/Gas Steam	1,108	1,108	1,108	1,108	1,108	1,108	1,108	1,108	1,108	1,108	648	648	648	648	-	-	-	-	-	-
GASTON 1 GAS	127	127	127	127	127	127	127	127	127	127	-	-	-	-	-	-	-	-	-	-
GASTON 2 GAS	128	128	128	128	128	128	128	128	128	128	-	-	-	-	-	-	-	-	-	-
GASTON 3 GAS	102	102	102	102	102	102	102	102	102	102	-	-	-	-	-	-	-	-	-	-
GASTON 4 GAS	103	103	103	103	103	103	103	103	103	103	-	-	-	-	-	-	-	-	-	-
YATES 6 GAS	323	323	323	323	323	323	323	323	323	323	323	323	323	323	-	-	-	-	-	-
YATES 7 GAS	326	326	326	326	326	326	326	326	326	326	326	326	326	326	-	-	-	-	-	-
Combustion Turbine	1,491	1,491	2,091	2,814	2,815	2,815	2,815	2,815	2,815	2,815	2,807	2,807	2,807	2,807	2,807	2,807	2,807	2,807	2,807	2,807
GASTON A	8	8	8	8	8	8	8	8	8	8	-	-	-	-	-	-	-	-	-	-
MCDONOUGH 3A	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
MCDONOUGH 3B	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
MCINTOSH 1A	82	82	82	82	82	82	82	82	82	82	82	82	82	82	82	82	82	82	82	82
MCINTOSH 2A	82	82	82	82	82	82	82	82	82	82	82	82	82	82	82	82	82	82	82	82
MCINTOSH 3A	82	82	82	82	82	82	82	82	82	82	82	82	82	82	82	82	82	82	82	82
MCINTOSH 4A	82	82	82	82	82	82	82	82	82	82	82	82	82	82	82	82	82	82	82	82
MCINTOSH 5A	82	82	82	82	82	82	82	82	82	82	82	82	82	82	82	82	82	82	82	82
MCINTOSH 6A	82	82	82	82	82	82	82	82	82	82	82	82	82	82	82	82	82	82	82	82
MCINTOSH 7A	82	82	82	82	82	82	82	82	82	82	82	82	82	82	82	82	82	82	82	82
MCINTOSH 8A	82	82	82	82	82	82	82	82	82	82	82	82	82	82	82	82	82	82	82	82
MCMANUS 3A	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44
MCMANUS 3B	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44
MCMANUS 3C	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44
MCMANUS 4A	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44
MCMANUS 4B	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44
MCMANUS 4C	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44
MCMANUS 4D	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44
MCMANUS 4E	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44
MCMANUS 4F	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44
MCMANUS DIESEL	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
WANSLEY 5A	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
WARNER ROBINS 1	80	80	80	80	80	80	80	80	80	80	80	80	80	80	80	80	80	80	80	80
WARNER ROBINS 2	80	80	80	80	80	80	80	80	80	80	80	80	80	80	80	80	80	80	80	80
WILSON 1A	55	55	55	55	55	55	55	55	55	55	55	55	55	55	55	55	55	55	55	55
WILSON 1B	54	54	54	54	54	54	54	54	54	54	54	54	54	54	54	54	54	54	54	54
WILSON 1C	38	38	38	38	38	38	38	38	38	38	38	38	38	38	38	38	38	38	38	38
WILSON 1D	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25
WILSON 1E	52	52	52	52	52	52	52	52	52	52	52	52	52	52	52	52	52	52	52	52
WILSON 1F	43	43	43	43	43	43	43	43	43	43	43	43	43	43	43	43	43	43	43	43
WILSON DIESEL	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
YATES 10	-	-	-	441	441	441	441	441	441	441	441	441	441	441	441	441	441	441	441	441
YATES 8	-	-	300	441	441	441	441	441	441	441	441	441	441	441	441	441	441	441	441	441
YATES 9	-	-	300	441	441	441	441	441	441	441	441	441	441	441	441	441	441	441	441	441
Pump Storage	403	403	403	403	403	403	403	403	403	403	403	403	403	403	403	403	403	403	403	403
ROCKY MTN 1 PS	63	63	63	63	63	63	63	63	63	63	63	63	63	63	63	63	63	63	63	63
ROCKY MTN 2 PS	63	63	63	63	63	63	63	63	63	63	63	63	63	63	63	63	63	63	63	63
ROCKY MTN 3 PS	63	63	63	63	63	63	63	63	63	63	63	63	63	63	63	63	63	63	63	63
WALLACE DAM 1 PS	53	53	53	53	53	53	53	53	53	53	53	53	53	53	53	53	53	53	53	53
WALLACE DAM 2 PS	53	53	53	53	53	53	53	53	53	53	53	53	53	53	53	53	53	53	53	53
WALLACE DAM 5 PS	53	53	53	53	53	53	53	53	53	53	53	53	53	53	53	53	53	53	53	53
WALLACE DAM 6 PS	53	53	53	53	53	53	53	53	53	53	53	53	53	53	53	53	53	53	53	53
Hydro	688	688	693	693	693	693	693	693	693	693	693	693	693	693	693	693	693	693	693	693
BARILETT'S FERRY 1 HY	16	16	16	16	16	16	16	16	16	16	16	16	16	16	16	16	16	16	16	16
BARILETT'S FERRY 2 HY	16	16	16	16	16	16	16	16	16	16	16	16	16	16	16	16	16	16	16	16
BARILETT'S FERRY 3 HY	16	16	16	16	16	16	16	16	16	16	16	16	16	16	16	16	16	16	16	16
BARILETT'S FERRY 4 HY	22	22	22	22	22	22	22	22	22	22	22	22	22	22	22	22	22	22	22	22
BARILETT'S FERRY 5 HY	59	59	59	59	59	59	59	59	59	59	59	59	59	59	59	59	59	59	59	59
BARILETT'S FERRY 6 HY	59	59	59	59	59	59	59	59	59	59	59	59	59	59	59	59	59	59	59	59
BURTON 1 HY	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5
BURTON 2 HY	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5
ESTATON 1 HY	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
FLINTRIVER 1 HY	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2
FLINTRIVER 2 HY	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2
FLINTRIVER 3 HY	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2
GOAT ROCK 3 HY	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5
GOAT ROCK 4 HY	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
GOAT ROCK 5 HY	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
GOAT ROCK 6 HY	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5
GOAT ROCK 7 HY	9	9	9	9	9	9	9	9	9	9	9	9	9	9	9	9	9	9	9	9
GOAT ROCK 8 HY	9	9	9	9	9	9	9	9	9	9	9	9	9	9	9	9	9	9	9	9
LANGDALES HY	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
LANGDALES 6 HY	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
LLOYD SHOALS 1 HY	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4
LLOYD SHOALS 2 HY	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4
LLOYD SHOALS 3 HY	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4
LLOYD SHOALS 4 HY	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4
LLOYD SHOALS 5 HY	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4
LLOYD SHOALS 6 HY	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4
MORGAN FALLS 1 HY	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2
MORGAN FALLS 2 HY	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2
MORGAN FALLS 3 HY	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
MORGAN FALLS 4 HY	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
MORGAN FALLS 5 HY	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2



[illegible]



ASI CLASSIC 210 MW -US2: BUTLERSOLAR FARM	211	212	213	214	215	216	217	218	219	220	221	222	223	224	225	226	227	228	229	230	231	232	233	234	235	236	237	238	239	240	241	242	243	244	245	246	247	248	249	250
ASI CLASSIC 210 MW -US2: DECATUR COUNTY SOLAR PROJECT	251	252	253	254	255	256	257	258	259	260	261	262	263	264	265	266	267	268	269	270	271	272	273	274	275	276	277	278	279	280	281	282	283	284	285	286	287	288	289	290
ASI CLASSIC 210 MW -US2: HECATE ENERGY-OLD MIDVILLE RD LLC	291	292	293	294	295	296	297	298	299	300	301	302	303	304	305	306	307	308	309	310	311	312	313	314	315	316	317	318	319	320	321	322	323	324	325	326	327	328	329	330
ASI CLASSIC 210 MW -US2: SOLAR GLYNN	331	332	333	334	335	336	337	338	339	340	341	342	343	344	345	346	347	348	349	350	351	352	353	354	355	356	357	358	359	360	361	362	363	364	365	366	367	368	369	370
ASI PRIME 525 MW -DG S1625	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
ASI PRIME 525 MW -DG S1635	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
ASI PRIME 525 MW -DG S1725	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	
ASI PRIME 525 MW -DG S1730	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	
ASI PRIME 525 MW -DG S1735	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	
ASI PRIME 525 MW -DG S1815	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
ASI PRIME 525 MW -DG S1820	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
ASI PRIME 525 MW -DG S1825	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
ASI PRIME 525 MW -DG S1835	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
ASI PRIME 525 MW -DG W1725	7	7	7	7	7	7	7	7	7	7	7	7	7	7	7	7	7	7	7	7	7	7	7	7	7	7	7	7	7	7	7	7	7	7	7	7	7	7	7	
ASI PRIME 525 MW -DG W1730	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	
ASI PRIME 525 MW -DG W1735	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	
ASI PRIME 525 MW -DG W1815	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
ASI PRIME 525 MW -DG W1820	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
ASI PRIME 525 MW -DG W1825	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	
ASI PRIME 525 MW -DG W1830	12	12	12	12	12	12	12	12	12	12	12	12	12	12	12	12	12	12	12	12	12	12	12	12	12	12	12	12	12	12	12	12	12	12	12	12	12	12	12	
ASI PRIME 525 MW -DG W1835	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	
ASI PRIME 525 MW -US1: BUTLERSOLAR	65	65	65	65	65	65	65	65	65	65	65	65	65	65	65	65	65	65	65	65	65	65	65	65	65	65	65	65	65	65	65	65	65	65	65	65	65	65	65	
ASI PRIME 525 MW -US1: DECATUR PARKWAY SOLAR PROJECT	52	52	52	52	52	52	52	52	52	52	52	52	52	52	52	52	52	52	52	52	52	52	52	52	52	52	52	52	52	52	52	52	52	52	52	52	52	52	52	
ASI PRIME 525 MW -US1: PARKWAY SOLAR	20	20	20	20	20	20	20	20	20	20	20	20	20	20	20	20	20	20	20	20	20	20	20	20	20	20	20	20	20	20	20	20	20	20	20	20	20	20	20	
ASI PRIME 525 MW -US2:1: LIVE OAK SOLAR	28	28	28	28	28	28	28	28	28	28	28	28	28	28	28	28	28	28	28	28	28	28	28	28	28	28	28	28	28	28	28	28	28	28	28	28	28	28	28	
ASI PRIME 525 MW -US2:2: WHITE OAK SOLAR	42	42	42	42	42	42	42	42	42	42	42	42	42	42	42	42	42	42	42	42	42	42	42	42	42	42	42	42	42	42	42	42	42	42	42	42	42	42	42	
ASI PRIME 525 MW -US2:2: WHITE PINE SOLAR	56	56	56	56	56	56	56	56	56	56	56	56	56	56	56	56	56	56	56	56	56	56	56	56	56	56	56	56	56	56	56	56	56	56	56	56	56	56	56	
AXIUM US SOLAR HOLDINGS (SD&D)	1	1	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
BLUE CANYON	71	71	71	71	71	71	71	71	71	71	71	71	71	71	71	71	71	71	71	71	71	71	71	71	71	71	71	71	71	71	71	71	71	71	71	71	71	71	71	
CCSP DG -ONLINE	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
CCSP DG -REMAINING	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	
COCA-COLA	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	
CONVERSE RENEWABLE ENERGY	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	
DAHLBERG 1	-	-	-	-	75	75	75	75	75	75	75	75	75	75	75	75	75	75	75	75	75	75	75	75	75	75	75	75	75	75	75	75	75	75	75	75	75	75	75	75
DAHLBERG 10	75	75	75	75	75	75	75	75	75	75	75	75	75	75	75	75	75	75	75	75	75	75	75	75	75	75	75	75	75	75	75	75	75	75	75	75	75	75	75	75
DAHLBERG 2	74	74	74	74	74	74	74	74	74	74	74	74	74	74	74	74	74	74	74	74	74	74	74	74	74	74	74	74	74	74	74	74	74	74	74	74	74	74	74	74
DAHLBERG 3	-	-	-	-	75	75	75	75	75	75	75	75	75	75	75	75	75																							



SANTAROSA	215	215	215	215	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
SUPERIOR-WASTE MANAGEMENT	6	6	6	6	6	6	6	6	6	6	6	6	-	-	-	-	-	-	-	-
WALTON COUNTY	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
WANSLEY 6	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
WANSLEY 7	598	598	598	598	598	598	598	598	598	598	598	-	-	-	-	-	-	-	-	-
WASHINGTON COUNTY	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Dispatchable DSOs (MW)	729	735	739	739	742	746	751	754	759	763	766	770	777	783	789	803	813	824	835	846
CVR Level 1	231	234	237	236	238	240	242	244	246	248	250	252	255	258	261	268	274	279	285	290
CVR Level 2	231	234	237	236	238	240	242	244	246	248	250	252	255	258	261	268	274	279	285	290
DER Customer Program	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
DPEC	92	92	92	92	92	92	92	92	92	92	92	92	92	92	92	92	92	92	92	92
RIPeDA	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5
RIPeHA	135	135	135	135	135	135	135	135	135	135	135	135	135	135	135	135	135	135	135	135
Temp Check	34	34	34	34	34	34	34	34	34	34	34	34	34	34	34	34	34	34	34	34
Energy Storage	-	-	715	715	715	715	715	715	715	715	715	715	715	715	715	715	715	715	715	715
2019 IRP BESS DEMO	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2019 IRP BESS DEMO - FORT STEWART 4 HR BESS	-	-	13	13	13	13	13	13	13	13	13	13	13	13	13	13	13	13	13	13
2022 IRP MCGRAU FORD 2 HR BATTERY	-	-	265	265	265	265	265	265	265	265	265	265	265	265	265	265	265	265	265	265
2023 IRP UPDATE - HAMMOND	-	-	58	58	58	58	58	58	58	58	58	58	58	58	58	58	58	58	58	58
2023 IRP Update - MCGRAU FORD PHASE 2	-	-	265	265	265	265	265	265	265	265	265	265	265	265	265	265	265	265	265	265
2023 IRP UPDATE - MOODY AFB	-	-	17	17	17	17	17	17	17	17	17	17	17	17	17	17	17	17	17	17
2023 IRP UPDATE - ROBINS AFB	-	-	32	32	32	32	32	32	32	32	32	32	32	32	32	32	32	32	32	32
MOSSY BRANCH	-	-	65	65	65	65	65	65	65	65	65	65	65	65	65	65	65	65	65	65
2025 IRP Approvals Projected Timing & Capacities - Extensions are Above	-	120	120	127	253	332	464	778	791	805	805	618	618	618	618	618	618	618	618	618
SCHERER3 WHOLESALE-TO-RETAIL	-	52	52	52	52	107	187	187	187	187	187	-	-	-	-	-	-	-	-	-
MCINTOSH 1A UPRATE	-	-	-	-	-	14	14	14	14	14	14	14	14	14	14	14	14	14	14	14
MCINTOSH 2A UPRATE	-	-	-	-	14	14	14	14	14	14	14	14	14	14	14	14	14	14	14	14
MCINTOSH 3A UPRATE	-	-	-	-	-	-	-	14	14	14	14	14	14	14	14	14	14	14	14	14
MCINTOSH 4A UPRATE	-	-	-	-	-	-	-	-	14	14	14	14	14	14	14	14	14	14	14	14
MCINTOSH 5A UPRATE	-	-	-	-	-	-	-	14	14	14	14	14	14	14	14	14	14	14	14	14
MCINTOSH 6A UPRATE	-	-	-	-	14	14	14	14	14	14	14	14	14	14	14	14	14	14	14	14
MCINTOSH 7A UPRATE	-	-	-	-	14	14	14	14	14	14	14	14	14	14	14	14	14	14	14	14
MCINTOSH 8A UPRATE	-	-	-	-	-	-	14	14	14	14	14	14	14	14	14	14	14	14	14	14
MCINTOSH 10 UPRATE	-	-	-	-	34	34	34	34	34	34	34	34	34	34	34	34	34	34	34	34
MCINTOSH 11 UPRATE	-	-	-	-	34	34	34	34	34	34	34	34	34	34	34	34	34	34	34	34
VOGTLE 1 UPRATE	-	-	-	-	7	7	27	27	27	27	27	27	27	27	27	27	27	27	27	27
VOGTLE 2 UPRATE	-	-	-	7	7	7	27	27	27	27	27	27	27	27	27	27	27	27	27	27
Temp Check Increase	-	68	68	68	68	68	68	68	68	68	68	68	68	68	68	68	68	68	68	68
2026 DG RFP (COA 2028)	-	-	-	-	10	10	10	10	10	10	10	10	10	10	10	10	10	10	10	10
2027 DG RFP (COA 2029)	-	-	-	-	-	10	10	10	10	10	10	10	10	10	10	10	10	10	10	10
CARES 2026 US RFP	-	-	-	-	-	-	-	300	300	300	300	300	300	300	300	300	300	300	300	300
Extensions for Reference Only - Extensions Included Above	-	-	-	-	1,005	1,005	926	926	926	926	458	-	-	-	-	-	-	-	-	-
SCHERER3	-	-	-	-	537	537	458	458	458	458	458	-	-	-	-	-	-	-	-	-
GASTON 1 GAS	-	-	-	-	127	127	127	127	127	127	127	-	-	-	-	-	-	-	-	-
GASTON 2 GAS	-	-	-	-	128	128	128	128	128	128	128	-	-	-	-	-	-	-	-	-
GASTON 3 GAS	-	-	-	-	102	102	102	102	102	102	102	-	-	-	-	-	-	-	-	-
GASTON 4 GAS	-	-	-	-	103	103	103	103	103	103	103	-	-	-	-	-	-	-	-	-
GASTON A	-	-	-	-	8	8	8	8	8	8	8	-	-	-	-	-	-	-	-	-
2025 IRP Approvals Total for Reference Only	-	120	120	127	1,258	1,337	1,390	1,704	1,717	1,731	1,263	618	618	618	618	618	618	618	618	618
CARES 2023 RFP	-	-	-	-	-	267	267	267	267	267	267	267	267	267	267	267	267	267	267	267
GA Solar S, LLC (Old Hickory Solar)	-	-	-	-	-	65	65	65	65	65	65	65	65	65	65	65	65	65	65	65
Wilsonville Solar, LLC	-	-	-	-	-	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50
Stellar Dry Creek Solar, LLC	-	-	-	-	-	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50
Stellar Shamrock Solar, LLC	-	-	-	-	-	56	56	56	56	56	56	56	56	56	56	56	56	56	56	56
Beaver Creek Solar I, LLC	-	-	-	-	-	46	46	46	46	46	46	46	46	46	46	46	46	46	46	46
Winter 2027_2028 BESS RFP	-	-	-	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50
Twiggs County BESS	-	-	-	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50
2029-2031 All-Source RFP	-	-	-	300	1,807	5,849	6,973	6,973	6,973	6,973	6,973	6,973	6,973	6,973	6,973	6,899	6,899	6,899	6,899	6,899
Mid-GAPPA (CC)	-	-	-	300	300	300	300	300	300	300	300	300	300	300	300	300	300	300	300	300



Plant Dahlberg PPA (CT)	-	-	-	-	-	74	74	74	74	74	74	74	74	74	74	74	-	-	-	-	-
Plant Hamis PPA (CC)	-	-	-	-	-	658	658	658	658	658	658	658	658	658	658	658	658	658	658	658	658
Sandersville PPA (CT)	-	-	-	-	-	-	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146
Laurens County (ESS+Solar)	-	-	-	-	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100
Plant Mitchell (ESS+Solar)	-	-	-	-	75	75	75	75	75	75	75	75	75	75	75	75	75	75	75	75	75
Bowen BESS Phase 1	-	-	-	-	250	250	250	250	250	250	250	250	250	250	250	250	250	250	250	250	250
South Hail BESS	-	-	-	-	125	125	125	125	125	125	125	125	125	125	125	125	125	125	125	125	125
Wansley BESS	-	-	-	-	500	500	500	500	500	500	500	500	500	500	500	500	500	500	500	500	500
Yates BESS Phase 1	-	-	-	-	320	320	320	320	320	320	320	320	320	320	320	320	320	320	320	320	320
Yates BESS Phase 2	-	-	-	-	137	137	137	137	137	137	137	137	137	137	137	137	137	137	137	137	137
Bowen BESS Phase 2	-	-	-	-	-	125	125	125	125	125	125	125	125	125	125	125	125	125	125	125	125
Thomson BESS	-	-	-	-	-	250	250	250	250	250	250	250	250	250	250	250	250	250	250	250	250
Hammond BESS Phase 2	-	-	-	-	-	-	96	96	96	96	96	96	96	96	96	96	96	96	96	96	96
McIntosh BESS	-	-	-	-	-	-	125	125	125	125	125	125	125	125	125	125	125	125	125	125	125
Bowen Unit 7 (CC)	-	-	-	-	-	741	741	741	741	741	741	741	741	741	741	741	741	741	741	741	741
Bowen Unit 8 (CC)	-	-	-	-	-	741	741	741	741	741	741	741	741	741	741	741	741	741	741	741	741
Wansley Unit 10 (CC)	-	-	-	-	-	727	727	727	727	727	727	727	727	727	727	727	727	727	727	727	727
Wansley Unit 11 (CC)	-	-	-	-	-	727	727	727	727	727	727	727	727	727	727	727	727	727	727	727	727
McIntosh Unit 12 (CC)	-	-	-	-	-	-	757	757	757	757	757	757	757	757	757	757	757	757	757	757	757
Supplemental Resources (MW)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Decatur BESS	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Dougherty BESS	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Wadley BESS	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Washington BESS	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
White Oak BESS	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
White Pine BESS	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
MPC PPA Extension	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Tenaska PPA (CT)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-



Georgia Power Load vs. Nameplate Capacity MG0 (Summer) with February 2025 Load Forecast, 2025 IRP Approvals, CARES 2023 RFP, Winter 2027\_2028 BESS RFP, and 2029-2031 All-Source RFP

Year	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044
February 2025 Load Forecast Peak Demand (MW), (A)	17,716	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
Owned Generating Capacity (MW), (B)	14,000	14,840	16,291	17,014	17,014	17,038	16,958	16,958	16,958	16,958	16,491	12,647	12,645	12,645	11,996	11,996	11,996	11,996	11,996	11,996
Purchased Generating Capacity (MW), (B,C)	8,807	9,056	9,056	8,980	8,515	6,624	8,906	8,906	8,849	8,823	7,061	6,729	6,546	6,322	6,321	6,012	5,932	5,915	5,905	5,901
Dispatchable DSOs (MW), (B)	838	844	849	848	851	855	860	863	867	871	874	878	884	890	896	910	920	930	941	951
2025 IRP Approvals, Excluding Extensions (MW), (B,D)	0	117	117	124	290	408	541	1,555	1,568	1,582	1,582	1,395	1,395	1,395	1,395	1,395	1,395	1,395	1,395	1,395
CARES 2023 RFP (MW), (B)	0	0	0	0	0	1,068	1,068	1,068	1,068	1,068	1,068	1,068	1,068	1,068	1,068	1,068	1,068	1,068	1,068	1,068
Winter 2027_2028 BESS RFP (MW), (B)	0	0	0	200	200	200	200	200	200	200	200	200	200	200	200	200	200	200	200	200
2029-2031 All-Source RFP (MW), (B,E)	0	0	0	300	2,220	6,637	7,982	7,982	7,982	7,982	7,982	7,982	7,982	7,982	7,982	7,908	7,908	7,908	7,908	7,908
Supplemental Resources (MW), (B,E)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Owned Generating Capacity after 2025 IRP Approvals & RFPs (MW), (B)	14,000	14,892	16,343	17,273	19,309	23,086	24,339	24,352	24,366	24,379	23,912	19,861	19,879	19,879	19,230	19,230	19,230	19,230	19,230	19,230
Purchased Generating Capacity after 2025 IRP Approvals & RFPs (MW), (B,C)	8,807	9,056	9,056	9,280	8,865	8,824	11,252	12,252	12,195	12,169	10,407	10,075	9,892	9,668	9,667	9,284	9,204	9,187	9,177	9,173
Dispatchable DSOs after 2025 IRP Approvals & RFPs (MW), (B)	838	909	914	913	916	920	925	928	932	936	939	943	949	955	961	975	985	995	1,006	1,016
Total Capacity (MW), (B)	23,646	24,858	26,313	27,466	29,090	32,829	36,515	37,532	37,493	37,484	35,257	30,899	30,720	30,501	29,859	29,489	29,419	29,412	29,413	29,419
Capacity Required to Meet GPC Target (MW), (F)	(2,639)	(2,945)	(2,632)	(1,290)	(65)	(1,946)	(4,265)	(4,439)	(3,805)	(3,440)	(987)	3,538	4,038	4,492	5,436	5,992	6,485	6,959	7,439	7,996
GPC Reserve Margin (%), (G)	33.5%	34.5%	31.8%	25.0%	19.4%	26.6%	34.8%	35.1%	32.5%	31.1%	22.5%	6.9%	5.3%	3.8%	0.7%	-1.0%	-2.4%	-3.7%	-5.0%	-6.4%

Notes

(A) Territorial Load requirements less non-dispatchable DSOs.

(B) Values stated in nameplate capacity for supply-side resources and in program capacity for demand-side resources.

(C) Includes territorial and imported power purchases.

(D) Excludes requests to extend Plant Scherer Unit 3 and Plant Gaston Units 1-4 and A beyond 12/31/2028. These extensions are already included in Owned Generating Capacity.

(E) N/A

(F) Does not consider planning reserve sharing. Reflects GPC's Target Reserve Margin, resulting from a System Target Reserve Margin of 25.50% (2025-2027) and 26% (2028 and beyond).

(G) Nameplate capacity is not appropriate for resource adequacy planning and results in overstated reserve margins because it does not account for the effective load carrying capability or planning capacity of each resource.

Existing Capacity

	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044
Owned Generating Capacity (MW)	14,000	14,840	16,291	17,014	17,014	17,038	16,958	16,958	16,958	16,958	16,491	12,647	12,645	12,645	11,996	11,996	11,996	11,996	11,996	11,996
Nuclear	2,980	2,980	2,980	2,980	2,980	2,980	2,980	2,980	2,980	2,980	2,980	2,980	2,980	2,980	2,980	2,980	2,980	2,980	2,980	2,980
HATCH1	439	439	439	439	439	439	439	439	439	439	439	439	439	439	439	439	439	439	439	439
HATCH2	442	442	442	442	442	442	442	442	442	442	442	442	442	442	442	442	442	442	442	442
VOGTLE1	539	539	539	539	539	539	539	539	539	539	539	539	539	539	539	539	539	539	539	539
VOGTLE2	540	540	540	540	540	540	540	540	540	540	540	540	540	540	540	540	540	540	540	540
VOGTLE3	510	510	510	510	510	510	510	510	510	510	510	510	510	510	510	510	510	510	510	510
VOGTLE4	510	510	510	510	510	510	510	510	510	510	510	510	510	510	510	510	510	510	510	510
Coal	3,924	3,924	3,924	3,924	3,924	3,924	3,844	3,844	3,844	3,844	3,844	-	-	-	-	-	-	-	-	-
BOWEN1	714	714	714	714	714	714	714	714	714	714	714	-	-	-	-	-	-	-	-	-
BOWEN2	705	705	705	705	705	705	705	705	705	705	705	-	-	-	-	-	-	-	-	-
BOWEN3	910	910	910	910	910	910	910	910	910	910	910	-	-	-	-	-	-	-	-	-
BOWEN4	910	910	910	910	910	910	910	910	910	910	910	-	-	-	-	-	-	-	-	-
SCHERER1	75	75	75	75	75	75	75	75	75	75	75	-	-	-	-	-	-	-	-	-
SCHERER2	72	72	72	72	72	72	72	72	72	72	72	-	-	-	-	-	-	-	-	-
SCHERER3	537	537	537	537	537	537	458	458	458	458	458	-	-	-	-	-	-	-	-	-
WANSLEY1	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
WANSLEY2	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Combined Cycle	3,885	3,885	3,885	3,885	3,885	3,885	3,885	3,885	3,885	3,885	3,885	3,885	3,885	3,885	3,885	3,885	3,885	3,885	3,885	3,885
MCDONOUGH4	855	855	855	855	855	855	855	855	855	855	855	855	855	855	855	855	855	855	855	855
MCDONOUGH5	850	850	850	850	850	850	850	850	850	850	850	850	850	850	850	850	850	850	850	850
MCDONOUGH6	840	840	840	840	840	840	840	840	840	840	840	840	840	840	840	840	840	840	840	840
MCINTOSH10	670	670	670	670	670	670	670	670	670	670	670	670	670	670	670	670	670	670	670	670
MCINTOSH11	670	670	670	670	670	670	670	670	670	670	670	670	670	670	670	670	670	670	670	670



Oil/Gas Steam	1,108	1,108	1,108	1,108	1,108	1,108	1,108	1,108	1,108	1,108	648	648	648	648	-	-	-	-	-	-
GASTON 1 GAS	127	127	127	127	127	127	127	127	127	127	-	-	-	-	-	-	-	-	-	-
GASTON 2 GAS	128	128	128	128	128	128	128	128	128	128	-	-	-	-	-	-	-	-	-	-
GASTON 3 GAS	102	102	102	102	102	102	102	102	102	102	-	-	-	-	-	-	-	-	-	-
GASTON 4 GAS	103	103	103	103	103	103	103	103	103	103	-	-	-	-	-	-	-	-	-	-
YATES 6 GAS	323	323	323	323	323	323	323	323	323	323	323	323	323	323	-	-	-	-	-	-
YATES 7 GAS	326	326	326	326	326	326	326	326	326	326	326	326	326	326	-	-	-	-	-	-
Combustion Turbine	1,491	1,491	2,091	2,814	2,815	2,815	2,815	2,815	2,815	2,815	2,807	2,807	2,807	2,807	2,807	2,807	2,807	2,807	2,807	2,807
GASTON A	8	8	8	8	8	8	8	8	8	8	-	-	-	-	-	-	-	-	-	-
MCDONOUGH 3A	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
MCDONOUGH 3B	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
MCINTOSH 1A	82	82	82	82	82	82	82	82	82	82	82	82	82	82	82	82	82	82	82	82
MCINTOSH 2A	82	82	82	82	82	82	82	82	82	82	82	82	82	82	82	82	82	82	82	82
MCINTOSH 3A	82	82	82	82	82	82	82	82	82	82	82	82	82	82	82	82	82	82	82	82
MCINTOSH 4A	82	82	82	82	82	82	82	82	82	82	82	82	82	82	82	82	82	82	82	82
MCINTOSH 5A	82	82	82	82	82	82	82	82	82	82	82	82	82	82	82	82	82	82	82	82
MCINTOSH 6A	82	82	82	82	82	82	82	82	82	82	82	82	82	82	82	82	82	82	82	82
MCINTOSH 7A	82	82	82	82	82	82	82	82	82	82	82	82	82	82	82	82	82	82	82	82
MCINTOSH 8A	82	82	82	82	82	82	82	82	82	82	82	82	82	82	82	82	82	82	82	82
MCMANUS 3A	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44
MCMANUS 3B	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44
MCMANUS 3C	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44
MCMANUS 4A	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44
MCMANUS 4B	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44
MCMANUS 4C	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44
MCMANUS 4D	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44
MCMANUS 4E	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44
MCMANUS 4F	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44
MCMANUS DIESEL	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
WANSLEY 5A	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
WARNER ROBINS 1	80	80	80	80	80	80	80	80	80	80	80	80	80	80	80	80	80	80	80	80
WARNER ROBINS 2	80	80	80	80	80	80	80	80	80	80	80	80	80	80	80	80	80	80	80	80
WILSON 1A	55	55	55	55	55	55	55	55	55	55	55	55	55	55	55	55	55	55	55	55
WILSON 1B	54	54	54	54	54	54	54	54	54	54	54	54	54	54	54	54	54	54	54	54
WILSON 1C	38	38	38	38	38	38	38	38	38	38	38	38	38	38	38	38	38	38	38	38
WILSON 1D	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25	25
WILSON 1E	52	52	52	52	52	52	52	52	52	52	52	52	52	52	52	52	52	52	52	52
WILSON 1F	43	43	43	43	43	43	43	43	43	43	43	43	43	43	43	43	43	43	43	43
WILSON DIESEL	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
YATES 10	-	-	-	441	441	441	441	441	441	441	441	441	441	441	441	441	441	441	441	441
YATES 8	-	-	300	441	441	441	441	441	441	441	441	441	441	441	441	441	441	441	441	441
YATES 9	-	-	300	441	441	441	441	441	441	441	441	441	441	441	441	441	441	441	441	441
Pump Storage	403	403	403	403	403	403	403	403	403	403	403	403	403	403	403	403	403	403	403	403
ROCKY MTN 1 PS	63	63	63	63	63	63	63	63	63	63	63	63	63	63	63	63	63	63	63	63
ROCKY MTN 2 PS	63	63	63	63	63	63	63	63	63	63	63	63	63	63	63	63	63	63	63	63
ROCKY MTN 3 PS	63	63	63	63	63	63	63	63	63	63	63	63	63	63	63	63	63	63	63	63
WALLACE DAM 1 PS	53	53	53	53	53	53	53	53	53	53	53	53	53	53	53	53	53	53	53	53
WALLACE DAM 2 PS	53	53	53	53	53	53	53	53	53	53	53	53	53	53	53	53	53	53	53	53
WALLACE DAM 5 PS	53	53	53	53	53	53	53	53	53	53	53	53	53	53	53	53	53	53	53	53
WALLACE DAM 6 PS	53	53	53	53	53	53	53	53	53	53	53	53	53	53	53	53	53	53	53	53
Hydro	688	688	693	693	693	693	693	693	693	693	693	693	693	693	693	693	693	693	693	693
BARILETT'S FERRY 1 HY	16	16	16	16	16	16	16	16	16	16	16	16	16	16	16	16	16	16	16	16
BARILETT'S FERRY 2 HY	16	16	16	16	16	16	16	16	16	16	16	16	16	16	16	16	16	16	16	16
BARILETT'S FERRY 3 HY	16	16	16	16	16	16	16	16	16	16	16	16	16	16	16	16	16	16	16	16
BARILETT'S FERRY 4 HY	22	22	22	22	22	22	22	22	22	22	22	22	22	22	22	22	22	22	22	22
BARILETT'S FERRY 5 HY	59	59	59	59	59	59	59	59	59	59	59	59	59	59	59	59	59	59	59	59
BARILETT'S FERRY 6 HY	59	59	59	59	59	59	59	59	59	59	59	59	59	59	59	59	59	59	59	59
BURTON 1 HY	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5
BURTON 2 HY	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5
ESTATON 1 HY	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
FLINTRIVER 1 HY	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2
FLINTRIVER 2 HY	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2
FLINTRIVER 3 HY	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2
GOAT ROCK 3 HY	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5
GOAT ROCK 4 HY	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
GOAT ROCK 5 HY	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
GOAT ROCK 6 HY	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5
GOAT ROCK 7 HY	9	9	9	9	9	9	9	9	9	9	9	9	9	9	9	9	9	9	9	9
GOAT ROCK 8 HY	9	9	9	9	9	9	9	9	9	9	9	9	9	9	9	9	9	9	9	9
LANGDALES HY	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
LANGDALES 6 HY	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
LLOYD SHOALS 1 HY	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4
LLOYD SHOALS 2 HY	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4
LLOYD SHOALS 3 HY	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4
LLOYD SHOALS 4 HY	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4
LLOYD SHOALS 5 HY	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4
LLOYD SHOALS 6 HY	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4
MORGAN FALLS 1 HY	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2
MORGAN FALLS 2 HY	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2
MORGAN FALLS 3 HY	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
MORGAN FALLS 4 HY	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
MORGAN FALLS 5 HY	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2



[illegible]



[illegible]



SANTAROSA	215	215	215	215	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
SUPERIOR-WASTE MANAGEMENT	6	6	6	6	6	6	6	6	6	6	6	6	6	-	-	-	-	-	-	-
WALTON COUNTY	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
WANSLEY 6	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
WANSLEY 7	598	598	598	598	598	598	598	598	598	598	598	598	598	-	-	-	-	-	-	-
WASHINGTON COUNTY	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
<b>Dispatchable DSOs (MW)</b>																				
	<b>838</b>	<b>844</b>	<b>849</b>	<b>848</b>	<b>851</b>	<b>855</b>	<b>860</b>	<b>863</b>	<b>867</b>	<b>871</b>	<b>874</b>	<b>878</b>	<b>884</b>	<b>890</b>	<b>896</b>	<b>910</b>	<b>920</b>	<b>930</b>	<b>941</b>	<b>951</b>
CvRL Level 1	222	226	228	227	229	231	233	235	237	239	241	243	246	249	252	258	263	269	274	279
CvRL Level 2	222	226	228	227	229	231	233	235	237	239	241	243	246	249	252	258	263	269	274	279
DER Customer Program	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
DPEC	226	226	226	226	226	226	226	226	226	226	226	226	226	226	226	226	226	226	226	226
RIPeDA	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5
RIPeHA	130	130	130	130	130	130	130	130	130	130	130	130	130	130	130	130	130	130	130	130
Temp Check	33	33	33	33	33	33	33	33	33	33	33	33	33	33	33	33	33	33	33	33
<b>Energy Storage</b>																				
	-	-	<b>845</b>	<b>845</b>	<b>845</b>	<b>845</b>	<b>845</b>	<b>845</b>	<b>845</b>	<b>845</b>	<b>845</b>	<b>845</b>	<b>843</b>	<b>843</b>	<b>843</b>	<b>843</b>	<b>843</b>	<b>843</b>	<b>843</b>	<b>843</b>
2019 IRP BESS DEMO	-	-	2	2	2	2	2	2	2	2	2	2	-	-	-	-	-	-	-	-
2019 IRP BESS DEMO - FORT STEWART 4 HR BESS	-	-	13	13	13	13	13	13	13	13	13	13	13	13	13	13	13	13	13	13
2022 IRP MCGRAU FORD 2 HR BATTERY	-	-	265	265	265	265	265	265	265	265	265	265	265	265	265	265	265	265	265	265
2023 IRP UPDATE - HAMMOND	-	-	58	58	58	58	58	58	58	58	58	58	58	58	58	58	58	58	58	58
2023 IRP Update - MCGRAU FORD PHASE 2	-	-	265	265	265	265	265	265	265	265	265	265	265	265	265	265	265	265	265	265
2023 IRP UPDATE - MOODY AFB	-	-	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50
2023 IRP UPDATE - ROBINS AFB	-	-	128	128	128	128	128	128	128	128	128	128	128	128	128	128	128	128	128	128
MOSSY BRANCH	-	-	65	65	65	65	65	65	65	65	65	65	65	65	65	65	65	65	65	65
<b>2025 IRP Approvals Projected Timing &amp; Capacities - Extensions are Above</b>																				
	-	<b>117</b>	<b>117</b>	<b>124</b>	<b>290</b>	<b>408</b>	<b>541</b>	<b>1,555</b>	<b>1,568</b>	<b>1,582</b>	<b>1,582</b>	<b>1,395</b>	<b>1,395</b>	<b>1,395</b>	<b>1,395</b>	<b>1,395</b>	<b>1,395</b>	<b>1,395</b>	<b>1,395</b>	<b>1,395</b>
SCHERER 3 WHOLESALE-TO-RETAIL	-	52	52	52	52	107	187	187	187	187	187	187	-	-	-	-	-	-	-	-
MCINTOSH 1A UPRATE	-	-	-	-	-	14	14	14	14	14	14	14	14	14	14	14	14	14	14	14
MCINTOSH 2A UPRATE	-	-	-	-	14	14	14	14	14	14	14	14	14	14	14	14	14	14	14	14
MCINTOSH 3A UPRATE	-	-	-	-	-	-	-	14	14	14	14	14	14	14	14	14	14	14	14	14
MCINTOSH 4A UPRATE	-	-	-	-	-	-	-	-	14	14	14	14	14	14	14	14	14	14	14	14
MCINTOSH 5A UPRATE	-	-	-	-	-	-	-	-	14	14	14	14	14	14	14	14	14	14	14	14
MCINTOSH 6A UPRATE	-	-	-	-	14	14	14	14	14	14	14	14	14	14	14	14	14	14	14	14
MCINTOSH 7A UPRATE	-	-	-	-	14	14	14	14	14	14	14	14	14	14	14	14	14	14	14	14
MCINTOSH 8A UPRATE	-	-	-	-	-	-	14	14	14	14	14	14	14	14	14	14	14	14	14	14
MCINTOSH 10 UPRATE	-	-	-	-	34	34	34	34	34	34	34	34	34	34	34	34	34	34	34	34
MCINTOSH 11 UPRATE	-	-	-	-	34	34	34	34	34	34	34	34	34	34	34	34	34	34	34	34
VOGTLE 1 UPRATE	-	-	-	-	7	7	27	27	27	27	27	27	27	27	27	27	27	27	27	27
VOGTLE 2 UPRATE	-	-	-	7	7	7	27	27	27	27	27	27	27	27	27	27	27	27	27	27
Temp Check Increase	-	65	65	65	65	65	65	65	65	65	65	65	65	65	65	65	65	65	65	65
2026 DG RFP P (COA 2028)	-	-	-	-	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50
2027 DG RFP P (COA 2029)	-	-	-	-	-	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50
CARES 2026 US RFP	-	-	-	-	-	-	-	1,000	1,000	1,000	1,000	1,000	1,000	1,000	1,000	1,000	1,000	1,000	1,000	1,000
<b>Extensions for Reference Only - Extensions Included Above</b>																				
	-	-	-	-	<b>1,005</b>	<b>1,005</b>	<b>926</b>	<b>926</b>	<b>926</b>	<b>926</b>	<b>458</b>	-	-	-	-	-	-	-	-	-
SCHERER 3	-	-	-	-	537	537	458	458	458	458	458	-	-	-	-	-	-	-	-	-
GASTON 1 GAS	-	-	-	-	127	127	127	127	127	127	127	-	-	-	-	-	-	-	-	-
GASTON 2 GAS	-	-	-	-	128	128	128	128	128	128	128	-	-	-	-	-	-	-	-	-
GASTON 3 GAS	-	-	-	-	102	102	102	102	102	102	102	-	-	-	-	-	-	-	-	-
GASTON 4 GAS	-	-	-	-	103	103	103	103	103	103	103	-	-	-	-	-	-	-	-	-
GASTON A	-	-	-	-	8	8	8	8	8	8	8	-	-	-	-	-	-	-	-	-
<b>2025 IRP Approvals Total for Reference Only</b>																				
	-	<b>117</b>	<b>117</b>	<b>124</b>	<b>1,295</b>	<b>1,413</b>	<b>1,467</b>	<b>2,480</b>	<b>2,494</b>	<b>2,507</b>	<b>2,040</b>	<b>1,395</b>	<b>1,395</b>	<b>1,395</b>	<b>1,395</b>	<b>1,395</b>	<b>1,395</b>	<b>1,395</b>	<b>1,395</b>	<b>1,395</b>
<b>CARES 2023 RFP</b>																				
	-	-	-	-	-	<b>1,068</b>	<b>1,068</b>	<b>1,068</b>	<b>1,068</b>	<b>1,068</b>	<b>1,068</b>	<b>1,068</b>	<b>1,068</b>	<b>1,068</b>	<b>1,068</b>	<b>1,068</b>	<b>1,068</b>	<b>1,068</b>	<b>1,068</b>	<b>1,068</b>
GA Solar S, LLC (Old Hickory Solar)	-	-	-	-	-	200	200	200	200	200	200	200	200	200	200	200	200	200	200	200
Wilsonville Solar, LLC	-	-	-	-	-	200	200	200	200	200	200	200	200	200	200	200	200	200	200	200
Stellar Dry Creek Solar, LLC	-	-	-	-	-	200	200	200	200	200	200	200	200	200	200	200	200	200	200	200
Stellar Shamrock Solar, LLC	-	-	-	-	-	225	225	225	225	225	225	225	225	225	225	225	225	225	225	225
Beaver Creek Solar I, LLC	-	-	-	-	-	183	183	183	183	183	183	183	183	183	183	183	183	183	183	183
<b>Winter 2027_2028 BESS RFP</b>																				
	-	-	-	<b>200</b>	<b>200</b>	<b>200</b>	<b>200</b>	<b>200</b>	<b>200</b>	<b>200</b>	<b>200</b>	<b>200</b>	<b>200</b>	<b>200</b>	<b>200</b>	<b>200</b>	<b>200</b>	<b>200</b>	<b>200</b>	<b>200</b>
Twiggs County BESS	-	-	-	200	200	200	200	200	200	200	200	200	200	200	200	200	200	200	200	200
<b>2029-2031 All-Source RFP</b>																				
	-	-	-	<b>300</b>	<b>2,220</b>	<b>6,637</b>	<b>7,982</b>	<b>7,982</b>	<b>7,982</b>	<b>7,982</b>	<b>7,982</b>	<b>7,982</b>	<b>7,982</b>	<b>7,982</b>	<b>7,982</b>	<b>7,908</b>	<b>7,908</b>	<b>7,908</b>	<b>7,908</b>	<b>7,908</b>
Mid-GAPPA (CC)	-	-	-	300	300	300	300	300	300	300	300	300	300	300	300	300	300	300	300	300



Plant Dahlberg PPA (CT)	-	-	-	-	-	74	74	74	74	74	74	74	74	74	74	74	-	-	-	-	-
Plant Harris PPA (CC)	-	-	-	-	-	658	658	658	658	658	658	658	658	658	658	658	658	658	658	658	658
Sandersville PPA (CT)	-	-	-	-	-	-	146	146	146	146	146	146	146	146	146	146	146	146	146	146	146
Laurens County (ESS+Solar)	-	-	-	-	200	200	200	200	200	200	200	200	200	200	200	200	200	200	200	200	200
Plant Mitchell (ESS+Solar)	-	-	-	-	150	150	150	150	150	150	150	150	150	150	150	150	150	150	150	150	150
Bowen BESS Phase 1	-	-	-	-	250	250	250	250	250	250	250	250	250	250	250	250	250	250	250	250	250
South Hail BESS	-	-	-	-	250	250	250	250	250	250	250	250	250	250	250	250	250	250	250	250	250
Wansley BESS	-	-	-	-	500	500	500	500	500	500	500	500	500	500	500	500	500	500	500	500	500
Yates BESS Phase 1	-	-	-	-	320	320	320	320	320	320	320	320	320	320	320	320	320	320	320	320	320
Yates BESS Phase 2	-	-	-	-	250	250	250	250	250	250	250	250	250	250	250	250	250	250	250	250	250
Bowen BESS Phase 2	-	-	-	-	-	250	250	250	250	250	250	250	250	250	250	250	250	250	250	250	250
Thomson BESS	-	-	-	-	-	500	500	500	500	500	500	500	500	500	500	500	500	500	500	500	500
Hammond BESS Phase 2	-	-	-	-	-	-	193	193	193	193	193	193	193	193	193	193	193	193	193	193	193
McIntosh BESS	-	-	-	-	-	-	250	250	250	250	250	250	250	250	250	250	250	250	250	250	250
Bowen Unit 7 (CC)	-	-	-	-	-	741	741	741	741	741	741	741	741	741	741	741	741	741	741	741	741
Bowen Unit 8 (CC)	-	-	-	-	-	741	741	741	741	741	741	741	741	741	741	741	741	741	741	741	741
Wansley Unit 10 (CC)	-	-	-	-	-	727	727	727	727	727	727	727	727	727	727	727	727	727	727	727	727
Wansley Unit 11 (CC)	-	-	-	-	-	727	727	727	727	727	727	727	727	727	727	727	727	727	727	727	727
McIntosh Unit 12 (CC)	-	-	-	-	-	-	757	757	757	757	757	757	757	757	757	757	757	757	757	757	757
<b>Supplemental Resources (MW)</b>	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Decatur BESS	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Dougherty BESS	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Wadley BESS	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Washington BESS	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
White Oak BESS	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
White Pine BESS	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
MPC PPA Extension	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Tenaska PPA (CT)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-



LM-4: Company  
response to Staff  
discovery request  
STF-PIA-7-1



**Docket Nos. 56298 & 56310**  
**Georgia Power Company's Application for the Certification of Capacity from**  
**The 2029-2031 All-Source RFP and Supplemental Resources**

**STF-PIA-7-1**

Question:

Please provide, in an executable Excel format, the Company's forecasted annual Revenue Requirement for the period of 2025-2040 without the inclusion of any new Large Load customers that started taking service as of January 1, 2024 as well as forecasted new Large Load customers. New Large Load customers are defined as customers with a contract demand of at least 100 MW. For this response, please utilize the Company's currently approved capital structure and authorized return on rate base as well as the current income tax rates.

Response:

The Company does not have total forecasted annual revenue requirements for the period 2025-2040. The Company also does not calculate total forecasted annual revenue without the inclusion of any subset of customers it expects to serve, including new large load customers, because the Company plans a system that serves total forecasted load as a whole.

The Company has provided estimated revenue requirements for each of the resources requested to be certified in these dockets, based on the Company's approved capital structure, return on equity, and income tax rates as of the date the proposals were submitted, as part of the bid information, RFP evaluation process, and in summary form in response to data requests in this proceeding. The Company has summarized those revenue requirements in STF-PIA-7-1 Attachment TRADE SECRET for the period 2026-2030. In addition, the Company has provided the revenue forecast for large load customers in the attachment as filed in the 2025 Integrated Resource Plan ("IRP") Rebuttal Testimony in Docket No. 56002. Large load customers are 45 MW or greater for Industrial customers and 115 MW and greater for Commercial customers, which is consistent with the load forecast treatment and the Quarterly Large Load Report.



Attachment  
has been  
redacted in  
its entirety.



LM-5: Company  
response to Staff  
discovery request  
STF-PIA-15-1



**Georgia Power Company**  
**Docket Nos. 56298& 56310**  
**Certification of 2029-2031 All-Source RFP & 2028-2031 Supplemental Resources**  
**STF-PIA Data Request Set No. 15**

**STF-PIA-15-1**

Question:

Please provide a copy of “STF-PIA-1-8 Attachment A TRADE SECRET.xlsx” that is updated to reflect the B2026 load and energy forecast.

Response:

Please refer to STF-PIA-15-1 Attachment A TRADE SECRET for more information.



Attachment  
has been  
redacted in  
its entirety.



LM-6: Company  
response to Staff  
discovery request  
STF-PIA-9-12



**Georgia Power Company**  
**Docket No. 56298 & 56310**  
**Certification of 2029-2031 All-Source RFP & 2028-2031 Supplemental Resources**  
**STF-PIA Data Request Set No. 9**

**STF-PIA-9-12**

Question:

Referring to the Direct Testimony of Francisco Valle, p. 5, line 4, the Company is requesting 9,900 MW of capacity resources to meet increasing customer needs. Please explain and differentiate between portion of this additional capacity need is driven by unit retirements, organic load growth, or large load growth. For the portion of capacity need driven by large load growth, please also differentiate between load that is under a executed contract with new terms pursuant to new Commission rules and regulations, load that is under a executed contract without new terms, and load that is not under an executed contract.

Response:

The referenced 9,900 MW capacity resource request is driven mainly by load growth and the expiration of existing PPAs. There are no unit retirements supporting the 9,900 MW request. There are 3,347 MW of PPAs set to expire by 2030. Of the portion driven by load growth, large loads are a driving force, accounting for approximately 90% of the projected load growth from 2026-2031. The Company currently has 4,600 MW of contracted loads included in the Budget 2026 (“B2026”) Load and Energy Forecast that were executed prior to the revisions to the Company’s rules and regulations. For additional information on contracted loads included in the Company’s B2026 Load and Energy Forecast, please refer to the Company’s Q2 Large Load Economic Development Report. Since filing the B2026 Load and Energy Forecast on September 17, 2025, the Company has filed for Commission review three large load contracts containing terms consistent with the new rules and regulations. Collectively, these three contracts total almost 1,900 MW. The additional resources cannot be directly differentiated to the items referenced in the question as there are other impacts to capacity needs such as prior approved resources, capacity equivalence values, planning reserve margin levels leading into the time period in question, and changes in resource ratings.



LM-6A: Company  
response to Staff  
discovery request  
STF-PIA-8-7



**Georgia Power Company**  
**Docket Nos. 56298 & 56310**  
**Certification of 2029-2031 All-Source RFP & 2028-2031 Supplemental Resources**  
**STF-PIA Data Request Set No. 8**

**STF-PIA-8-7**

Question:

Please refer to the Company's Large Load Economic Development Report for Quarter 2 of 2025 in Docket No. 55378:

- a. In Table 2, what is the difference between the rows labeled "Total Pipeline" and "Large Load Pipeline"?
- b. Please explain how the Company determines which projects fall in the "Commitments" and "Broken Ground" categories in Table 2. What commitments must a customer have made to qualify for each of these categories?
- c. On page 5, please explain how the Company determines which projects fall in the "Technical Review," "Request for Service," and "Contract for Electric Service" categories. What commitments must a customer have made to qualify for each of these categories?
- d. Please explain how the categories in part (b) and (c) map to each other.

Response:

- a. "Total Pipeline" refers to the pipeline of potential Commercial and Industrial projects the Company could serve in excess of 10 MW. "Large Load Pipeline" refers to the subset of the "Total Pipeline" in excess of 45 MW and 115 MW for Industrial and Commercial customers, respectively. The difference between these two categories reflects the organically sized potential projects the Company could serve. Because the Company has historically served projects of this size, these projects are meant to be captured using the Company's traditional econometric forecasting methodologies used to compile the organic Commercial and Industrial forecasts.
- b. Commitments are defined as projects that, at a bare minimum, have executed a Request for Service ("RFS"). The commitments category includes customers who have only executed an RFS and customers who have executed both an RFS and a Contract for Electric Service ("CES"). The "Broken Ground" category is a subset of the commitments who have commenced construction of their site.



**Georgia Power Company**  
**Docket Nos. 56298 & 56310**  
**Certification of 2029-2031 All-Source RFP & 2028-2031 Supplemental Resources**  
**STF-PIA Data Request Set No. 8**

- c. Customers who have not executed an RFS or CES but remain in the Company's internal review process are classified as "Technical Review." Customers who have executed an RFS, but have not executed a CES, are classified as "Request for Service." Finally, customers who have executed a CES are classified as "Contract for Electric Service."
- d. The rounded sum of projects labeled "Request for Service" and "Contract for Electric Service" on Page 5 equal the commitments reflected in Table 2. "Broken Ground" in Table 2 reflects the subset of committed projects in Table 2 and on Page 5 who have commenced construction of their site.



LM-7: Company  
response to Staff  
discovery request  
STF-PIA-9-18



**Georgia Power Company**  
**Docket Nos. 56298 & 56310**  
**Certification of 2029-2031 All-Source RFP & 2028-2031 Supplemental Resources**  
**STF-PIA Data Request Set No. 9**

**STF-PIA-9-18**

Question:

Refer to the Company's Second Quarter 2025 Quarterly Economic Development Reports. Identify the customers that have signed a RFS and have put up collateral with the RFS. Identify the customers that have signed a RFS and have not put up collateral with the RFS.

Response:

All projects contained in the Company's Q2 Large Load Economic Development Report that have an executed Request for Electric Service ("RFS") were executed prior to collateral being collected at this stage of the project process. Therefore, none of the projects with an executed RFS in the referenced report had posted collateral upon execution of the RFS.



LM-8: Company  
response to Staff  
discovery request  
STF-PIA-15-4



**Georgia Power Company**  
**Docket Nos. 56298& 56310**  
**Certification of 2029-2031 All-Source RFP & 2028-2031 Supplemental Resources**  
**STF-PIA Data Request Set No. 15**

**STF-PIA-15-4**

Question:

With reference to STF-PIA-8-7, part (c):

- a. Please explain in detail the requirements that a prospective customer must meet to execute a Request for Service.
- b. Is there any financial commitment associated with executing a Request for Service? If yes, please explain what the commitment is. If no, please explain why not.
- c. Please explain in detail the requirements that a prospective customer must meet to execute a Contract for Electric Service.
- d. Is there any financial commitment associated with executing a Contract for Electric Service? If yes, please explain what the commitment is. If no, please explain why not.

Response:

- a. To execute a Request for Service (“RFS”) Large Load customers under the revised rules and regulations provide the following information:
  - signed non-disclosure agreement (“NDA”)
  - site control status
  - zoning status
  - required project intake documentation
  - initial performance security and associated documentation

Additionally, Georgia Power will have performed work associated with engineering and planning studies relating to their in-service date and associated load ramps.

- b. Yes. Large Load customers post performance security upon executing an RFS. When the customer later signs a Contract for Electric Service (“CES”), the performance security held under the RFS is replaced by the performance security terms as part of the CES.
- c. Prior to executing a CES, Large Load customers under the revised rules and regulations must complete the RFS and associated requirements identified in subpart (a), when required, and must also provide an increased performance security amount associated with the CES.



**Georgia Power Company**  
**Docket Nos. 56298& 56310**  
**Certification of 2029-2031 All-Source RFP & 2028-2031 Supplemental Resources**  
**STF-PIA Data Request Set No. 15**

- d. Yes. In addition to other terms and conditions included in the CES, Large Load customers under the revised rules and regulations are responsible for each of the following financial obligations upon execution of the CES:
- contractual minimum bills over the term of the contract
  - Electric service charges
  - ongoing performance security requirements
  - termination payments
  - any excess facilities charges or other charges or fees as defined in the CES



LM-9: Company  
response to Staff  
discovery request  
STF-PIA-17-14



**Georgia Power Company**  
**Docket Nos. 56298& 56310**  
**Certification of 2029-2031 All-Source RFP & 2028-2031 Supplemental Resources**  
**STF-PIA Data Request Set No. 17**

**STF-PIA-17-14**

Question:

With reference to the “Main” tab of the excel attachment to the Q2 2025 Large Load Economic Development Report:

- a. Please provide an updated version of this dataset that reflects the Company’s current understanding of its pipeline of prospective customers.
- b. Please confirm that the amount of load with a signed contract for electric service in the dataset from part (a) sums to 6,231 MW in 2031, as shown in the document “Demonstrative Exhibit – Direct Hearing 10.21.25.” If it does not, please explain why not and identify which customers account for the discrepancy.
- c. If Georgia Power anticipates that peak load from the prospective customers in the dataset from part (a) will be different in the summer and winter, please provide equivalent versions of this dataset (projected peak load by customer and year) for the summer and winter.

Response:

- a. The Company plans to file its Q3 2025 Large Load Economic Development Report in mid-November with information through September 30, 2025.
- b. Please see response to subpart (a).
- c. The Company does not anticipate differences between summer and winter peak for these customers once they have reached their mature ramp.



LM-10: Company  
response to Staff  
discovery request  
STF-PIA-9-3



**Georgia Power Company**  
**Docket Nos. 56298 & 56310**  
**Certification of 2029-2031 All-Source RFP & 2028-2031 Supplemental Resources**  
**STF-PIA Data Request Set No. 9**

**STF-PIA-9-3**

Question:

Referring to the Company's Budget 2026 Load and Energy Forecast report, pp. 6-7, Figures 1.1-1 & 1.1-2, the Company shows that the Peak forecasts for years 2026 and 2027 have decreased from the B2025 forecast to the B2026 Forecast. Please respond to the following questions:

- a. To what extent are the reductions in forecasted peak load driven by reductions in the organic load forecast as opposed to the large load forecast?
- b. For reductions driven by the large load forecast, please explain if the primary drivers for load reductions are project cancellations, project delays, or diminished load materialization?

Response:

- a. For the summer peak forecast (Figure 1.1-1), the large load forecast reductions account for 81% of the total reductions for 2026 and 78% for 2027, while the organic load forecast reductions account for the rest. For the winter peak forecast (Figure 1.1-2), the large load forecast reductions account for all the reductions; the organic forecast stays the same (less than 0.01% increase) and therefore did not drive any reduction in forecasted peak load.
- b. Reductions driven by the large load forecast in 2026 and 2027 are mainly related to the Company's changes to the Load Realization Model ("LRM") methodology introduced in the Company's 2025 Integrated Resource Plan ("IRP") Rebuttal Testimony in Docket No. 56002. These changes result in a more disciplined, stringent risk adjustment, thus driving decreases to the LRM output and subsequent adjustment to peak demand. See pages 9-10 of Francisco Valle's Direct Testimony, filed September 17, 2025, where these adjustments are described in more detail. The MW in the Company's Budget 2026 ("B2026") Large Load Pipeline in years 2026 and 2027 are greater than or equal to those supporting the Budget 2025 ("B2025") Forecast. As such, decreases in the forecasted peak demand in those years are driven neither by project cancellations nor project delays. After 2030, the Company's B2026 Large Load Forecast surpasses B2025, as the magnitude of Large Load Pipeline increases more than offset the effects of the changes the Company implemented to the LRM.



LM-11: Company  
response to Staff  
discovery request  
STF-PIA-5-19



**Georgia Power Company**  
**Docket Nos. 56298 & 56310**  
**Certification of 2029-2031 All-Source RFP & 2028-2031 Supplemental Resources**  
**STF-PIA Data Request Set No. 5**

**STF-PIA-5-19**

Question:

Referring to the Company's Quarterly Economic Development Reports, please respond to the following questions:

- a. Since the February 2025 LRM Sensitivity, has the Company analyzed the tendency for projects to accelerate or delay initially proposed load ramps? If so, please provide any such analysis in its original format in addition to a narrative description of the analysis performed. For any spreadsheet responses, please ensure the file is provided in spreadsheet format with any formulas and references intact.
- b. Since the February 2025 LRM Sensitivity, has the Company observed any trends in the tendency for projects to accelerate or delay initially proposed load ramps? If so, do these trends differ from the assumptions in the Load Realization model?
- c. Since the February 2025 LRM Sensitivity, has the Company analyzed the tendency for projects to select Georgia Power as the ultimate service provider, referring to the P1, P2, and P3 probabilities? If so, please provide any such analysis in its original format in addition to a narrative description of the analysis performed. For any spreadsheet responses, please ensure the file is provided in spreadsheet format with any formulas and references intact.
- d. Since the February 2025 LRM Sensitivity, has the Company observed any trends in the tendency for projects to select Georgia Power as the ultimate service provider, referring to the P1, P2, and P3 probabilities? If so, do these trends differ from the assumptions in the Load Realization Model?
- e. Since the February 2025 LRM Sensitivity, has the Company analyzed the tendency for projects to materialize load as expected? If so, please provide any such analysis in its original format in addition to a narrative description of the analysis performed. For any spreadsheet responses, please ensure the file is provided in spreadsheet format with any formulas and references intact.
- f. Since the February 2025 LRM Sensitivity, has the Company observed any trends in the tendency for projects to materialize as expected? If so, do these trends differ from the assumptions in the Load Realization Model?



**Georgia Power Company**  
**Docket Nos. 56298 & 56310**  
**Certification of 2029-2031 All-Source RFP & 2028-2031 Supplemental Resources**  
**STF-PIA Data Request Set No. 5**

Response:

- a. In the Company-filed Quarterly Large Load Economic Development Reports, the Company tracks projects whose initial service date has changed. The Company has not analyzed the tendency for projects to accelerate or delay initially proposed load ramps. In each run of the LRM, the Company continues to use the latest customer-provided information.
- b. Please see response to part (a).
- c. The Company has not analyzed the tendency for projects to select Georgia Power as the ultimate service provider.
- d. The Company has not observed any trends in the tendency for projects to select Georgia Power as the ultimate service provider.
- e. The Company continues to monitor Large Load projects' actual utilization for those having reached commercial operation. However, many of the customers who have reached commercial operation have not reached their full load. Therefore, the Company lacks the adequate level of history to analyze the tendency for load materialization.
- f. The Company has initially observed customers ramping up slower than expected. However, due to the infancy and small sample size of said projects, the Company lacks adequate data to reach actionable conclusions.



LM-12: Company  
response to Staff  
discovery request  
STF-PIA-8-8



**Georgia Power Company**  
**Docket Nos. 56298 & 56310**  
**Certification of 2029-2031 All-Source RFP & 2028-2031 Supplemental Resources**  
**STF-PIA Data Request Set No. 8**

**STF-PIA-8-8**

Question:

Please refer to the Company's Large Load Economic Development Report for Quarter 2 of 2025 in Docket No. 55378:

- a. Do any of the prospective large load customers discussed in this report have clean energy commitments? Please explain and specify how many of the prospective customers have such commitments.
- b. Have any of the prospective large load customers expressed interest in purchasing green power from Georgia Power? Please explain and specify how many of the prospective customers have made such requests.
- c. Has the Company investigated whether any of the prospective large load customers could use load flexibility to reduce the magnitude of their peak load? Please explain.
- d. Please name all tariff structures that are currently available to new large load customers.
- e. Does GPC plan to develop any new tariffs for prospective large load customers?

Response:

- a. Yes, some prospective large load customers discussed in the Company's Large Load Economic Development Report for Quarter 2 of 2025 have clean energy commitments. The Company does not track the clean energy commitments for all prospective large load customers, but there are seven prospective large load customers who have previously or recently expressed interest in participating in the Company's renewable energy programs to support their clean energy commitments.
- b. See response to subpart (a) above.
- c. Yes, the Company has held discussions on the portfolio of program options available and potential impact load flexibility could have with prospective large load customers. Demand response reductions, load flexibility potential, and system impacts will vary depending on factors including but not limited to a customer's load profile, potential for on-site



**Georgia Power Company**  
**Docket Nos. 56298 & 56310**  
**Certification of 2029-2031 All-Source RFP & 2028-2031 Supplemental Resources**  
**STF-PIA Data Request Set No. 8**

distributed energy resource (“DER”) assets, system requirements, and other site-specific characteristics.

- d. New large load customers with an expected peak demand of 100 MW or greater at one or more premises located on one tract or contiguous tracts of land may only take service under the TOU-SC Monthly Access Charge Option (“MAC”).

New large load customers with an expected peak demand less than 100 MW may take service under the PLL, RTP-DA, RTP-HA, TOU-EO, or TOU-GSD tariffs. Additionally, if a new large load customer with an expected peak demand less than 100 MW meets certain tariff-specific requirements, they may take service under one of the following tariffs: G, TOU-SC Standard Price Option, or, at the Company’s option, TOU-SC Flat Price Option or TOU-SC MAC.

- e. The Company considers the potential of new tariff options from time to time but does not plan to develop any new tariffs for prospective large load customers at this time.



LM-13: Company  
response to Staff  
discovery request  
STF-PIA-15-6



File has been  
redacted in its  
entirety.



LM-14: Company  
response to Staff  
discovery request  
STF-PIA-8-5



**Georgia Power Company**  
**Docket Nos. 56298 & 56310**  
**Certification of 2029-2031 All-Source RFP & 2028-2031 Supplemental Resources**  
**STF-PIA Data Request Set No. 8**

**STF-PIA-8-5**

Question:

Regarding gas FT costs at the proposed Company-owned combined cycle facilities (Bowen CC, Wansley CC, and McIntosh CC):

- a. What is the projected annual cost of gas FT at each of these plants? Please provide all supporting workpapers with formulas intact and sources clearly identified.
- b. How did the Company account for ongoing gas FT costs at these plants in its RFP bid evaluation? Please explain.

Response:

- a. Please see STF-PIA-1-1 Attachment A TRADE SECRET, section 2 – Evaluation, specifically under subsection (a) Conforming list, subfolder “Fuels.”
- b. The firm transportation (“FT”) costs are reflected in the RFP bid evaluation under the “Fixed Fuel” category. The costs are input within the Firm Fuel Costs Inputs tab in the capacity evaluator spreadsheet.



# LM-15: Company Request for Proposal - Gas Forecast Bid Summary



File has been  
redacted in its  
entirety.



LM-16: Company  
response to Staff  
discovery request  
STF-PIA-1-2  
(attachment not  
included due to  
size and  
complexity of Excel  
file).



**Georgia Power Company**  
**Docket No. 56298 & 56310**  
**Certification of 2029-2031 All-Source RFP & 2028-2031 Supplemental Resources**  
**STF-PIA Data Request Set No. 1**

**STF-PIA-1-2**

Question:

Provide all analyses conducted ranking the 2029-2031 All Source RFP identified projects and supplemental projects side by side. Provide any summary memos, presentations, and/or workpapers supporting the comparisons and full list ranking evaluation. Provide all workpapers electronically in excel spreadsheet format.

Response:

Please see STF-PIA-1-2 Attachments A-C TRADE SECRET.



LM-17: Company  
response to Staff  
discovery request  
STF-PIA-3-4



**Georgia Power Company**  
**Docket Nos. 56298 & 56310**  
**Certification of 2029-2031 All-Source RFP & 2028-2031 Supplemental Resources**  
**STF-PIA Data Request Set No. 3**

**STF-PIA-3-4**

Question:

Did the Company perform any Aurora analyses (optimization or production cost evaluation) that evaluated all of the proposed resources in one modeling run? If so, please provide such study, all Aurora files and workpapers. If not, explain why not?

Response:

The Company did not perform any Aurora analyses evaluating all proposed resources from the All-Source Certification Application and the Supplemental Resources Certification Application in a single modeling run. Based on the Company's projected capacity needs and timing of those needs, all resources on the Conforming List and later stages of the All-Source RFP were needed to meet capacity needs in 2029 through 2031. The only submissions released from consideration in the RFP were mutually exclusive variations of the same resources and the Company-owned proposals, totaling seven total combined cycle ("CC") units. Only five total Company-owned CCs advanced to the Short List, and the selection was based on the schedule and timing of capacity needs. Therefore, further Aurora analyses were not conducted to select a portfolio subset of resources.



LM-18: Company  
response to Staff  
discovery request  
STF-PIA-3-1



**Georgia Power Company**  
**Docket Nos. 56298 & 56310**  
**Certification of 2029-2031 All-Source RFP & 2028-2031 Supplemental Resources**  
**STF-PIA Data Request Set No. 3**

**STF-PIA-3-1**

Question:

Regarding Competitive Tier and Short list projects

- a. Please provide a list of the Competitive Tier consisting of 25 proposals, totaling 9,808 unique MW of winter capacity. For each proposal on each list, identify the resource, the type of capacity, and the net evaluated cost.
- b. Please provide a list consisting of the Short List composed of 21 proposals totaling 8,248 MW of winter capacity. For each proposal on each list, identify the resource, the type of capacity, and the net evaluated cost.
- c. Please identify the 1,560 MW that did not make it on the short list and indicate why not. For each proposal on each list, identify the resource, the type of capacity, and the net evaluated cost.

Response:

- a. Please see STF-PIA-3-1 Attachment TRADE SECRET, “Competitive Tier” tab.
- b. Please see STF-PIA-3-1 Attachment TRADE SECRET, “Short List” tab.
- c. The Bowen Combined Cycle (“CC”) Units 7-10 Company-owned proposal was released, while the mutually exclusive Bowen CC Units 7-8 Company-owned proposal advanced to the Short List. This resulted in a net reduction of 1,560 unique MW of winter capacity. To meet the Company’s projected capacity needs, the Company determined that only five Company-owned CCs were needed on the short list. Portfolio 2, which included Bowen CC Units 7-8, was selected for the Short List because it was better aligned to meet the timing of capacity needs than Portfolio 1, which included Bowen CC Units 7-10.



Attachment  
has been  
redacted in  
its entirety.



LM-18A: Company  
response to Staff  
discovery request  
STF-PIA-15-3



**Georgia Power Company**  
**Docket Nos. 56298& 56310**  
**Certification of 2029-2031 All-Source RFP & 2028-2031 Supplemental Resources**  
**STF-PIA Data Request Set No. 15**

**STF-PIA-15-3**

Question:

With reference to STF-PIA-3-1:

- a. Please provide a list of the Initial Bids. For each proposal on the list, identify the resource, the type of capacity, and the net evaluated cost.
- b. Please identify the capacity that did not make it to the Conforming Bid stage and explain why not.
- c. Please provide a list of the Conforming Bids. For each proposal on each list, identify the resource, the type of capacity, and the net evaluated cost.
- d. Please identify the capacity that did not make it to the Competitive Tier stage and explain why not.

Response:

- a. Please see STF-PIA-1-1 Attachment A TRADE SECRET, section 1 – Bid Data, file (a) for a summary of all initial bids. No net evaluated cost evaluation was performed at this stage of the RFP.
- b. The Conforming List included 33 proposals, totaling 10,513 unique MW of winter capacity. A total of 5,034 MW of winter capacity did not make it to the Conforming List stage. The Conforming List included proposals that conformed to all RFP requirements and secured their spot by posting bid security by no later than 15 business Days after receiving notice from the Independent Evaluator that the bid advanced to the Conforming List, as documented in Part 4.8 of the All-Source RFP
- c. Please see STF-PIA-1-1 Attachment A TRADE SECRET, section 2 – Evaluation, subsection (a): Conforming List, file “Ranking - GPC All-Source Capacity RFP 2029-2031 - Conforming List.xlsx”.
- d. A total of 705 MW of unique winter capacity did not make it from Conforming List to Competitive Tier after the release of the Plant Harris Combined Cycles (“CCs”) Asset Purchase Agreement (APA) in favor of retaining the Power Purchase Agreement (PPA) versions of this bid and the Company Owned Proposal team withdrawing the proposed Wansley CC without Dalton co-ownership.



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LM-19: Company  
response to Staff  
discovery request  
STF-PIA-1-3



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**STF-PIA Data Request Set No. 1**

**STF-PIA-1-3**

Question:

Provide all presentations made to Georgia Power or Southern Company management or board of directors regarding the resources being acquired.

Response:

See STF-PIA-1-3 Attachments A through P related to the procurement process for the resources being acquired. Please note that information related to Supplemental Resource options investigated but ultimately not pursued or finalized, which were not included in the Company's request for certification, have been removed. STF-PIA-1-3 Attachments E-H contain the relevant Georgia Power and Southern Company Board of Directors presentation excerpts regarding the resources for which the Company has sought certification in Docket Nos. 56298 and 56310.



Attachment  
has been  
redacted in  
its entirety.



LM-20: Company  
response to Staff  
discovery request  
STF-PIA-3-37



**Georgia Power Company**  
**Docket No. 56298 & 56310**  
**Certification of 2029-2031 All-Source RFP & 2028-2031 Supplemental Resources**  
**STF-PIA Data Request Set No. 3**

**STF-PIA-3-37**

Question:

Regarding the decision to bid CCs.

- a. Please describe all evaluations conducted by the Companies regarding the decision to bid CCs, but no CTs COPs at existing generating sites (Wansley, McIntosh, Bowen).
- b. In reaching the decision not to bid CTs, explain if the Company solicited information from EPC contractors or OEMs regarding the pricing and availability of CT projects to use to compare to CC projects. If not, explain why not.
- c. Provide all RFI or informal inquiry information received in its evaluation of potential new CT or CC capacity.
- d. See pg. 43 of the Application, which states the COPs will use Mitsubishi 501JAC combined cycle power plants. Explain how the Company evaluated other CC manufactures and reached the conclusion that it would use the Mitsubishi plant. Provide any reports, memos, analyses that were conducted/developed that led to the selection of the Mitsubishi plant.
- e. Did the Company compare different technology (F-class, H-class, etc.), please explain.
- f. Did the Company consider alternative configurations (1x1 vs. 2x1)? Please explain how it settled on the proposed configuration as in the past it seemed the Company preferred 2x1 configurations?
- g. Provide all bids, RFI responses, or other documentation received regarding manufacturer, technology type, and configuration. Please provide all analysis (qualitative and quantitative comparing the various options).
- h. Did the Company consider any other EPC contractors? Please provide all analysis (qualitative and quantitative) comparing the various options available to the Company.
- i. Compare and contrast the time required to build a CT vs. CC resource, and explain how that was considered in making decisions to bid and acquire resources in this RFP to meet the Company's needs.

Response:

- a. The Company's decision was based on the Company's expansion plans and expectations that projected capacity needs would be energy intensive and base load in nature. Combined cycles ("CCs") operate with greater efficiency and lower cost than simple cycle



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combustion turbines (“CTs”) and are therefore better suited to economically fulfill base load needs.

- b. The Company Owned Proposal team issued a request for information (“RFI”) on March 15, 2024, and an RFP on April 2, 2024, to solicit information from the three major CT original equipment manufacturers (“OEMs”) for equipment in both CT and CC configurations. This process resulted in the Company understanding that CTs, as long-lead equipment, would require entering into agreements to reserve needed manufacturing slots, regardless of configuration. The OEM RFI and RFP did not factor into the Company’s decision to submit CC COPs and not CT COPs. The Company did not solicit information from engineering, procurement, and construction (“EPC”) contractors for the construction of CT COPs as the Company had already made this decision prior to issuing an RFP to EPC contractors on July 29, 2024, for CCs only. Please reference Subpart (a) regarding the Company’s decision to submit CC based COPs.
- c. Georgia Power Company through the RFP Evaluation Team administered a formal RFI in 2023 to assess the availability of capacity resources that could meet the needs identified in the 2023 IRP Update. The results of this RFI, including a written summary and all responses received, were filed in Docket No. 55378 and are presented here in STF-PIA-3-37 Attachment A TRADE SECRET. For reference, the summary is as follows as it relates to “*new CT or CC capacity*”:
  - Georgia Power received two qualifying submissions for CT/CC thermal generation resources representing a total of 1,243 MW of potential capacity;
  - Both CT/CC projects were existing resources, not new developments;
  - These existing resources were not available to meet the capacity needs for the 2026–2028 timeframe addressed in the 2023 IRP Update;
  - No RFI participants indicated plans to develop new natural gas CT/CC resources.
- d. The Company Owned Proposal team conducted an RFI to the market on March 15, 2024, to determine the availability of equipment for thermal resources. Subsequently, the Company conducted an RFP for equipment on April 2, 2024. The evaluation of the equipment RFPs resulted in the selection of the Mitsubishi 501 JAC technology. Please see STF-PIA-3-37 Attachment B TRADE SECRET for additional information. All folders and documents included are Trade Secret.
- e. The Company’s selection of H/J-class technology is based on its greater capacity and higher efficiency when compared to that of F-class or other combustion turbine technologies. This results in a greater overall economic benefit to customers.



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- f. Yes, the Company considered 1x1 and 2x1 CC configurations. The COP Thermal projects included in the All-Source Certification Application are based on a 1x1 CC configuration as the 2x1 configuration would have an output greater than the 1,200 MW limit on proposals per the 2029-2031 All-Source RFP.
- g. Please reference STF-PIA-3-37 Subpart (d) for a description of the RFI and subsequent RFP process conducted by the Company.
- h. Yes, the Company engaged multiple vendors and conducted an open solicitation for EPC services that solicited bids from multiple vendors. This solicitation resulted in one compliant response, resulting in the selection of Black and Veatch.
- i. Generally, the time required to construct a CT is on the order of 30 months whereas a CC may require an additional six months or more. CCs can also take longer to develop due to greater time for design and procurement of steam cycle-related components, which a CT does not have. Please reference Subpart (a) regarding the Company's decision to submit CC based COPs.



LM-21: Company  
response to Staff  
discovery request  
STF-PIA-8-2



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**STF-PIA Data Request Set No. 8**

**STF-PIA-8-2**

Question:

Regarding the Company's response to STF-PIA-1-1, part (d):

- a. Please explain in narrative form the purpose of any Aurora modeling that the Company completed for the purposes of RFP evaluation.
- b. As part of its RFP bid evaluation, did the Company complete any capacity expansion modeling runs that allowed the model to select which RFP bids it found to be economic? Please explain why or why not.
- c. Besides the modeling described in part (a), did the Company complete any additional Aurora modeling to support its application in this docket? If so, please explain what modeling the Company completed.
- d. Did the Company include any of the proposed All-Source RFP or Supplemental resources in the modeling that it completed for the 2025 IRP? Please explain why or why not.
- e. If the answer to part (d) is yes, please explain whether the resources were hard-coded or included as selectable resources in the IRP modeling.

Response:

- a. The Company used the Aurora model during the All-Source request for proposals ("RFP") evaluation to assess production cost savings, or energy benefits, associated with each resource under consideration. These energy benefits reflect net values after accounting for variable generation costs, including fuel, energy storage charging, variable operations and maintenance, and start-up costs, as applicable. Each All-Source RFP resource and Supplemental Resource was individually modeled as an addition to the system, utilizing its specific operational dispatch characteristics. For a comprehensive explanation of the methodology used to model production cost savings, please see Exhibit H of the Company's All-Source Capacity RFP for 2029-2031.
- b. The Company did not undertake capacity expansion modeling solely to assess the relative economic value of All-Source RFP proposals. Given that the Company's projected capacity requirements necessitate procuring all RFP resources in addition to Supplemental



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Resources, a portfolio capacity expansion analysis was not warranted for selecting or excluding specific resources. Furthermore, such an analysis does not inherently provide a ranking of resources, which is essential when prioritization is required. However, the Company performed comprehensive capacity expansion modeling as part of its 2025 Integrated Resource Plan (“IRP”) Resource Mix Study, which informs the evaluation of energy benefits referenced in part (a).

- c. The Company did not perform additional Aurora modeling besides the modeling described in part (a).
- d. The Company did not include any of the proposed All-Source RFP or Supplemental Resources in the modeling completed for the 2025 IRP. The Company’s All-Source RFP was still in progress when the 2025 IRP modeling was completed.
- e. This is not applicable based on the response for (d).



LM-22: Company  
response to Staff  
discovery request  
STF-PIA-3-5



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**STF-PIA-3-5**

Question:

In the documents provided to the IE and available on the IE website, please explain what the “Portfolio 1” and “Portfolio 2” designation is and the purpose of the studies provided. How were the portfolios developed?

Response:

The portfolios represent two combinations of resources that could be selected to meet the Company’s capacity needs. The portfolios differ only in the combination of Company-owned combined cycle (“CC”) units that constitute a total of five. Portfolio 1 consists of four CC units at Bowen and one CC unit at McIntosh. Portfolio 2 consists of two CC units at Bowen, one CC unit at McIntosh, and two CC units at Wansley. All other resource selections remained equivalent across each portfolio. The purpose of evaluating both portfolios was to identify and compare the total transmission system impacts of two combinations of resources that would meet the Company’s projected capacity needs.



LM-23: Company  
response to Staff  
discovery request  
STF-PIA-8-4



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**STF-PIA-8-4**

Question:

Regarding the Company's trade secret response to STF-PIA-1-2, "STF- PIA-1-2 Attachment A TRADE SECRET.xlsm."

- a. Does the Company's methodology for ranking RFP bids take into account the variable costs associated with each project over its lifetime (for example, fuel costs and variable operations and maintenance)? Please explain.
- b. When it was evaluating the results of the ranking, is there any cost threshold at which the Company would have screened out bids as being uneconomic? Please explain why or why not.
- c. If the answer to part (b) is yes, please explain what the threshold is and how the Company calculated the threshold value.

Response:

- a. Yes, the Company's evaluation and rankings account for the projection of variable costs associated with each project over its life or term. These costs were modeled in Aurora for each project and are accounted for in the Energy Benefit component of the evaluation. Please refer to the response to STF-PIA-8-2 for more details on Aurora and energy benefits.
- b. The Company did not apply a cost threshold to eliminate uneconomic bids. The economic assessment prioritized a comparison of the net evaluated costs of various resources capable of meeting the Company's capacity requirements.
- c. This is not applicable based on the response to subpart (b).



LM-24: Company  
response to Staff  
discovery request  
STF-PIA-8-11



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**STF-PIA-8-11**

Question:

Regarding the Company's response to STF-PIA-3-37, part (i), which compares construction timelines for CCs and CTs. How long does it take the Company to bring online the following resource types?

- a. PPA solar, wind, or BESS – both paired and standalone
- b. Self-build solar
- c. Self-build wind
- d. Self-build BESS

Response:

- a. The Company does not know the construction timeframe for PPA resources to come online, as that is determined by and under the control of developers who submit bids in response to the Company's requests for proposals ("RFPs"). In RFPs the Company requests specific commercial operation dates ("CODs") and bidders bid in resources that can meet the RFP requirements.
- b. For a typical self-build utility-scale solar facility, the construction timeline from ground disturbance to the COD is approximately two years. This timeframe, and those stated in STF-PIA-3-37, do not account for other construction requirements, such as any required transmission projects for delivery service.
- c. For a typical self-build onshore wind facility, the construction timeline from ground disturbance to COD is approximately two years. This timeframe, and those stated in PIA-3-37, do not account for other construction requirements, such as any required transmission projects for delivery service. For a typical self-build Battery Energy Storage System ("BESS"), it is anticipated that the construction timeline from site mobilization to COD requires approximately 16 to 24 months. The overall size and existing site civil conditions can drive differences in duration. This timeframe, and those stated in PIA-3-37, does not account for other construction requirements, such as any required transmission projects for delivery service.



LM-25: Company  
response to Staff  
discovery request  
STF-PIA-3-35



## PUBLIC DISCLOSURE

### Georgia Power Company Docket No. 56298 & 56310

### Certification of 2029-2031 All-Source RFP & 2028-2031 Supplemental Resources STF-PIA Data Request Set No. 3

#### STF-PIA-3-35

##### Question:

Please confirm that the Company was offered Alternative (earlier) in-service dates for the following resources and explain what economic evaluation was conducted determining these resources were not economic compared to the supplemental resource requests.

- a. **REDACTED:** Given the Company's decision to acquire Supplemental Resources, explain why **REDACTED REDACTED REDACTED REDACTED** was not recommended for certification instead?
- b. **REDACTED:** Given the Company's decision to acquire Supplemental Resources, explain why **REDACTED REDACTED REDACTED REDACTED** was not recommended for certification instead?
- c. **REDACTED:** Given the Company's decision to acquire Supplemental Resources, explain why **REDACTED REDACTED REDACTED** was not recommended for certification instead?
- d. **REDACTED:** Given the Company's decision to acquire Supplemental Resources, explain why **REDACTED REDACTED REDACTED REDACTED** was not recommended for certification instead?

##### Response:

- a. Yes, the Company did receive alternative in-service dates for the resources specified in the referenced proposals. While a complete economic evaluation was conducted for the **REDACTED** Company-owned Proposal ("COP"), it was not selected for certification due to the incremental transmission infrastructure build-out required to serve this facility. The anticipated impacts to the transmission infrastructure could not be accommodated for the earlier commercial operation date ("COD") option. Instead, the project original COD has been recommended for certification. In contrast, the Battery Equipment Storage System ("BESS") Supplemental Resources being requested for certification are paired with existing solar, which already has a point of interconnection ("POI"), and no transmission network upgrades are required. Since the alternative COD projects were determined not to



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be feasible, no economic evaluation was conducted to directly compare these alternative COD COP projects to the proposed Supplemental Resources.

- b. The explanation in Subpart (a) of this response also applies to **REDACTED COP**.
- c. The explanation in Subpart (a) of this response also applies to **REDACTED COP**.
- d. The explanation in Subpart (a) of this response also applies to **REDACTED COP**.



LM-26: Company  
response to Staff  
discovery request  
STF-PIA-1-18



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**STF-PIA Data Request Set No. 1**

**STF-PIA-1-18**

Question:

Has the Company evaluated the impact of large loads on production cost?

- a. For the historic years 2016-2024, provide the realized energy requirements, peak demand, and load factor for both the system and Georgia Power.
- b. For the forecast years 2025-2036, provide the forecasted energy requirements, peak demand, and expected load factor for both the system and Georgia Power.
- c. Has the Company evaluated the impact that extremely high load factor large load customers may have on fuel and production costs? If so, please provide the evaluation. If not, explain why not and explain if the Company would anticipate average costs to go up or down and the reason for such an assumption.

Response:

a.

	Forecasted Energy Requirement (MWh)		Peak Demand* (MW)		Load Factor** (%)	
	GPC	SOCO	GPC	SOCO	GPC	SOCO
2016	88,326,725	196,589,286	16,244	36,390	61.9%	61.5%
2017	85,698,051	190,909,202	16,002	35,485	61.1%	61.4%
2018	88,932,186	198,100,355	15,748	36,951	64.5%	61.2%
2019	88,311,149	195,613,344	16,572	37,065	60.8%	60.2%
2020	83,998,360	185,530,221	15,831	35,768	60.4%	59.1%
2021	86,239,318	191,867,628	16,213	36,427	60.7%	60.1%
2022	89,122,674	199,910,501	17,074	39,836	59.6%	57.3%
2023	87,602,507	189,288,748	16,720	37,468	59.8%	57.7%
2024	90,672,383	195,702,499	16,555	38,766	62.4%	57.5%

Georgia Power Company ("GPC"); SOCO load is SOCO Territorial load.

\*Peak is the annual calendar peak demand

\*\*Load Factor is calculated using the Peak Demand



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**STF-PIA Data Request Set No. 1**

b.

	Forecasted Energy Requirement (MWh)		Peak Demand (MW)		Load Factor (%)	
	GPC	SOCO	GPC	SOCO	GPC	SOCO
2025	95,293,918	198,803,634	17,802	37,353	61.1%	60.8%
2026	102,557,353	206,954,262	18,770	37,998	62.4%	62.2%
2027	116,340,386	222,707,961	20,552	40,029	64.6%	63.5%
2028	133,718,704	238,966,348	22,730	41,988	67.0%	64.8%
2029	148,717,717	255,355,058	24,621	44,036	69.0%	66.2%
2030	159,371,509	267,437,128	25,841	45,402	70.4%	67.2%
2031	165,701,513	274,590,242	26,554	46,175	71.2%	67.9%
2032	169,286,736	278,398,003	26,895	46,532	71.7%	68.1%
2033	171,651,767	280,841,250	27,268	46,940	71.9%	68.3%
2034	174,043,138	283,351,871	27,550	47,202	72.1%	68.5%
2035	176,364,943	277,732,478	27,790	45,865	72.4%	69.1%
2036	178,514,934	271,872,269	27,939	44,138	72.7%	70.1%

Georgia Power Company (“GPC”); SOCO load is SOCO Territorial load

\*Peak is the annual calendar peak demand.

\*\*Load Factor is calculated using the Peak Demand

- c. The Company evaluates the impact of large loads on a marginal cost basis, assigning to the load a marginal cost for generation (energy and capacity), transmission, and distribution, if applicable. The Company has not evaluated the impact of the large loads on a Georgia Power or System production cost basis, but evaluates new load using the rate impact measure (“RIM”) test, which determines if the revenues associated with a new customer are sufficient to cover the marginal costs associated with the load on a net present value basis. Moreover, the Company will comply with the Commission’s April 17, 2025, Order on Georgia Power Company’s Revision to Rules and Regulations Tariff Compliance Filing in Docket No. 44280, which requires the Company to exercise its discretion under the Rules and Regulations in a manner designed to protect existing customers from bearing any of the costs of adding these large load customers.



LM-27: Company  
response to Staff  
discovery request  
STF-PIA-6-3



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**STF-PIA Data Request Set No. 6**

**STF-PIA-6-3**

Question:

Does the Company anticipate that new large load customers will participate in any flexible load, DSM, and/or curtailment programs? Have any adjustments been made to the Load and Resource Balance tables to consider such impacts? Please explain.

Response:

Georgia Power offers a robust portfolio of load flexibility and demand side management (“DSM”) programs, which can appeal to a wide variety of customer needs. The Company is in conversations with large load customers about these program options and is optimistic that this will lead to additional program participation.

Large commercial customers are eligible to participate in Georgia Power’s Commercial Prescriptive and Commercial Custom DSM programs. The Company includes adjustments to its load forecast and resource ledger for Commission-approved DSM programs.

Load flexibility options include the Demand Plus Energy Credit (“DPEC”) program, the DER Customer Pilot, DER Colocation (“DCL”), DER Customer Owned (“DCO”), Curtailable Load (“CL”), and Large Customer Owned Resiliency (“LCOR”) programs. Large commercial customers are eligible to participate in these demand response and distributed energy resource program options subject to the applicability requirements outlined in each tariff.

The Company does not know at this time whether new customers will choose to participate in load flexibility programs and, therefore, cannot plan on participation until it is known. As such, no adjustments have been made to the Load and Resource Balance workpapers or capacity need charts to consider such impacts for these programs. As customers elect to participate in these load flexibility programs in the future, the Company will make the appropriate adjustments.



LM-28: Company  
response to Staff  
discovery request  
STF-PIA-6-4



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**STF-PIA-6-4**

Question:

Does the Company anticipate that new large load customers will install behind the meter generation? Have any adjustment been made to the Load and Resource Balance tables to consider such impacts? Please explain.

Response:

No adjustments have currently been made to the Load and Resource Balance workpapers or capacity need charts to consider such impacts. The Company is actively working with customers interested in behind-the-meter generation and load flexibility programs, but we do not know at this time which (if any) large load customers will install behind-the-meter generation, what kind of generation assets they may choose, or whether they will elect to enroll such behind-the-meter assets into one of Georgia Power's programs. The Company will continue to work closely with any large load customer interested in doing so to make sure the customer has the information needed to support such a decision. The Company cannot plan on such behind-the-meter generation impacts until any such impact is known; once known, the Company will adjust plans accordingly. The Company's requests in this case are to support the demand requests of customers serving their full expected load without assuming the presence of behind-the-meter generation.



LM-29: Company  
response to Staff  
discovery request  
STF-PIA-3-33



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**STF-PIA-3-33**

Question:

Rate considerations:

- a. Has the Company estimated the anticipated near-term rate impacts associated with all of the new projects? If so, please provide the analysis including all assumptions and calculations. If not, why not and provide such an analysis.
- b. The Company agreed not to pursue a 2025 rate case and expects to file the next one in 2028. How does the Company expect to seek cost recovery for the 2027 supplemental resources and the new combined cycle resources expected to be in-service 11/1/2029?
- c. Has the Company assessed if the incremental revenues from new load contracts are expected to recover the expected revenue requirements associated with the RFP and Supplemental Projects? If so, please provide the Company's analysis. If not, explain why not and provide such an analysis.
- d. The Company has stated it believes that there will be downward pressure on rates with the new load and the addition of new resources that are needed to a certain extent to serve the new load. Please provide an analysis that proves there will be downward pressure on rates, based on the February 2025 load forecast and the resources being sought for Certification both in the Application and the Supplemental Application. Please consider this an ongoing request, and update using the September load forecast that will be supplied.
- e. Did Georgia Power include in its COP Thermal Project cost estimates any additional costs based on assumptions that it would have to expedite equipment/materials deliveries, count on aggressive labor schedules, or incur other cost premiums? If so, please explain what the extra costs are and explain what expedited timeline Georgia Power expects it will be able to achieve as a result. Provide all workpapers, calculations, cost assessments comparing regular equipment procurement or labor rates and expedited/accelerated costs and rates.

Response:

- a. The Company has not estimated near-term rate impacts associated with the projects filed in the All-Source RFP and Supplemental Resource certification filings. Common to both IRP and RFP evaluations, the resource economic evaluations are based on life cycle evaluations of all benefits and costs associated with the resources needed to serve all customers at the lowest incremental costs available to the Company and are not broken down into specific rate impacts or allocations amongst customers. As a result, estimated



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near-term rate impacts have not been calculated. Further, as agreed to in the stipulation to extend the Alternate Rate Plan, which was approved by the Commission in Docket No. 44280, base rates for the years 2026-2028 will not be adjusted for any new projects included in this filing. Any costs incurred to serve new large load customers are expected to be offset by the revenues from those customers.

- b. The Company expects costs associated with the 2027 Supplemental Resources to be included in the retail cost of service upon the in-service date of the units, which is expected to be prior to December 31, 2028. Given that base rates will not be adjusted for these projects for years 2026-2028, any revenue requirement associated with these projects prior to 2029 will not result in any rate adjustments during the period but will be included in retail cost of service in the calculation of the Company's annual retail return on equity. The revenue requirement for the 2027 Supplemental Resources for future years, as well as the new combined cycle resources expected to be in-service in November 2029 and any additional resources certified in the All-Source RFP, will be included in the 2028 base rate case filing, along with projected revenues from large load customers to offset those costs.
- c. The amendments to the Company's Rules and Regulations, which were approved by the Commission on April 17, 2025, in Docket No. 44280, require the Company to continue to exercise discretion in a manner designed to protect existing customers from bearing any of the costs of adding large load customers 100 MW or greater. As such, the Company has shared the details of the minimum bill calculation with Commission Staff for its review and has demonstrated that pricing for the large load customers is expected to cover their share of costs, including the cost of assets included in the All-Source RFP and the Supplemental Resource certification filings. Additionally, the Company will file the first twelve (12) such contracts with the Commission at least thirty (30) days prior to execution of the contract, in addition to documentation demonstrating that each contract complies with the requirements of the Commission's April 17 Order. A specific quantification of this analysis cannot be completed because the future revenue from large loads is not currently known, and the PPAs and generation assets have lengthy expected lives over which time they will serve both large loads and traditional (organic) load growth during the lives of the assets.
- d. Please see the Company's response to Subpart (c) above.
- e. Georgia Power did not include any additional costs in its Company-owned Proposal ("COP") Thermal project cost estimates related to expediting material or equipment



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deliveries, nor did it rely on aggressive labor schedules or incur other cost premiums. In purchasing Mitsubishi equipment, the Company did request options for early (expedited per Equipment Purchase Agreement) delivery to align with potential engineering, procurement, and construction (“EPC”) needs for Wansley Unit 9 and McIntosh Unit 12. The Company expects to exercise the optional early delivery date for Wansley Unit 9 and continues to evaluate the optional early delivery date for McIntosh Unit 12. The COP cost estimates include exercising these options.