

BEFORE THE
GEORGIA PUBLIC SERVICE COMMISSION

In Re: Georgia Power Company's
2022 Rate Case

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Docket No. 44280

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

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

1.

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

2.

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

3.

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

4.

SEIA is a non-profit corporation organized and existing under the laws of the District of Columbia. SEIA is the national trade association of the U.S. solar energy industry and represents organizations that promote, manufacture, install, and support the development of solar energy throughout the country and in Georgia. SEIA's mailing address is 1425 K Street, N.W., Suite 1000, Washington, D.C. 20005.

5.

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

6.

SEIA and its members have a substantial interest in the above-referenced proceeding. SEIA has members that own and operate solar generation projects throughout Georgia; members that install and maintain behind-the-meter solar and DER systems; members with local employees in the state; and members that list specific operating addresses in Georgia. SEIA members are planning to

develop, construct, operate, and otherwise service future behind-the-meter solar projects and other DER projects in Georgia, the success of which will rely on the results of these proceedings and the approval (in whole or in part) of tariff changes and proposals related to the Company's 2022 Rate Case, including but not limited to: discussion of proposed changes to tariffs for compensating customers with behind-the-meter solar systems and other DERs, including the RNR Monthly Netting program under the Company's RNR-10 tariff and the Customer DER Program and approved in the 2022 Integrated Resource Plan; issues relating to the Company's development of a DER management system; and the impact for solar customers of the Company's proposal to end the volumetric "R" tariff for new construction residential customers. SEIA members impacted by this Rate Case are numerous, and intervention by individual members would be unduly burdensome.

7.

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

8.

Vote Solar has actively participated in commission proceedings concerning resource procurement, solar valuation, and distributed generation program design in numerous states across the country, including Georgia, Florida, North Carolina, Louisiana, Arizona, California, Colorado, Idaho, Massachusetts, Minnesota, Nevada, New Mexico, New York, Utah, Vermont

and Wisconsin. This includes active participation in Georgia Power's application for approval of its 2016, 2019, and 2022 Integrated Resource Plans.

9.

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

10.

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

11.

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

12.

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

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

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

Respectfully submitted this 5th day of August, 2022.



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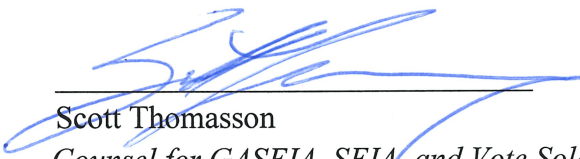
VERIFICATION

STATE OF GEORGIA

COUNTY OF FULTON

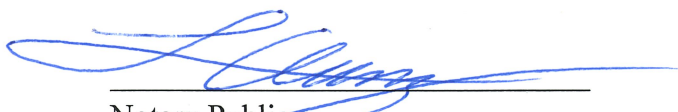
Scott Thomasson personally appeared before the undersigned Notary Public and stated under oath that he is an attorney for GASEIA, SEIA, and Vote Solar and is authorized to execute this verification on their behalf and that on her information and belief the facts alleged in the foregoing Application to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

This 5th day of August, 2022.

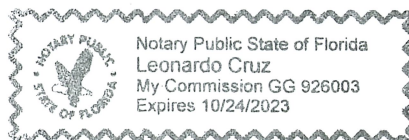


Scott Thomasson
Counsel for GASEIA, SEIA, and Vote Solar

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



Notary Public



CERTIFICATE OF SERVICE

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

A handwritten signature in black ink, appearing to read "Scott Thomasson", written over a horizontal line.

Scott Thomasson

Counsel for GASEIA, SEIA, and Vote Solar

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