BEFORE THE PUBLIC SERVICE COMMISSION

STATE OF GEORGIA

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

COMMENTS OF THE GEORGIA SOLAR ENERGY INDUSTRIES ASSOCIATION, INC. AND VOTE SOLAR IN OPPOSITION TO THE STIPULATION

Come now, the GEORGIA SOLAR ENERGY INDUSTRIES ASSOCIATION, INC. ("GSEIA") and VOTE SOLAR ("VS") and provide these Comments in opposition to the proposed Stipulation (the "Stipulation") entered between the Georgia Public Service Commission's Public Interest Advocacy Staff ("PIA Staff") and Georgia Power Company (the "Company" or "Georgia Power") on June 23, 2016. These Comments also constitute the Brief of GSEIA and VS[1] in this docket.

GENERAL COMMENTS

[1] Procedural and Scheduling Order (February 19, 2016), as amended by email from Tom Bond (July 9, 2016).

GSEIA and VS oppose the Stipulation. Below, GSEIA and VS discuss their concerns about the Stipulation by paragraph. Before that and in light of the Stipulation's terms, GSEIA and VS propose the following for new solar generation deployment between 2016-2019, as follows:

- **Utility Scale**: 825 MWs procured by competitive bidding deployed to take advantage of the Investment Tax Credit ("ITC");
- **Stand Alone Distributed Generation ("DG")**: 250 MWs procured by competitive bidding; and.
- **Customer Sited DG**: Based on customer demand, up to 250 MWs behind the meter deployment with excess export priced at the Company's solar avoided cost savings determined by the Company's Framework (when complete) levelized over a fifteen (15) year term.

This deploys 1125-1325 MWs of new solar deployment over the next three years.

The Stipulation appears to authorize deployment of 1600 MWs of renewable energy (mostly solar),[2] but close examination reveals that it may actually only authorize deployment of as little as 525 MWs of additional solar generation between 2016 and 2019 in which stakeholders and competitors may participate with the Company. This is the same amount of solar generation the Commission authorized in the 2013 IRP.[3] It is the same amount of <u>total</u> new renewable generation[4] the Company proposed in its Renewable Energy Development Initiative ("REDI"). Across all types of solar generation,

[2] Stipulation, ¶ 3. (1200 MWs (REDI); 200 MWs (Company self-build); 200 MWs Commercial and Industrial).

[3] In Re: Georgia Power Company's 2013 Integrated Resource Plan and Application for Decertification of Plant Branch Units 3 and 4, Plant McManus Units 1 and 2, Plant Kraft Units 1-4, Plant Yates Units 1-5, Plant Boulevard
Units 2 and 3, and Plant Bowen Unit 6; Docket 36498, "Final Order," 18 (July 17, 2013).

[4] IRP, Section 10.3, 10-106.Solar, Wind and Biomass together.

the Stipulation increases solar deployment over 2013 only for the Company's self-build projects and Stand Alone DG.

In the Stipulation, the Company and PIA Staff did not consider uncontested evidence and testimony that Company ratepayers will benefit from deployment of additional renewable generation of up to 2000 MWs from 2016-2019 with stable avoided costs, no grid impact and no upward pressure on rates[5] -- a market reality that will continue for a while.[6] The Stipulation fails to recognize that deployment of solar and renewable generation is now competitive, with private enterprise entrepreneurs competing directly with the Company to deploy these resources faster, cheaper and more efficiently. That said, the Commission (not the Company) must insure that additional solar generation will be deployed pursuant to policies and procedures that do not afford any competitor (including the Company) competitive advantage. The Stipulation fails to recognize the property rights of the Company's customers to make their own decisions regarding their own energy generation and usage. For excess generation exported back to the grid, the Stipulation fails to require the Company to pay fair market value (based on value of solar or solar avoided cost savings) for its use of its customer's property, i.e., the electrons exported to Georgia Power and used by it to provide electricity to its other customers.[7] The payment of fair market value for export at the Company's solar avoided cost savings is required since Georgia Power is the only monopoly purchaser of those electrons.[8]

RESPONSE TO SPECIFIC STIPULATION PARAGRAPHS

[5] See, generally: Executive Summary, "The Costs and Benefits of Distributed Solar Generation in Georgia," IRP filing, Draft January 25, 2016, pp. 2-7. T. 397:24-399:16.
[6] T. 398:16-399:6.
[7] T. 2052:1-3.
[8] T. 2051:23-2052:8.

Paragraph 3 (Utility Scale Solar):

Though GSEIA and VS focused on Customer-Sited DG in this IRP,[9] they support new, reasonable solar deployment across all classes of solar generation, including utility scale solar.[10] At first blush, Paragraph 3 appears to authorize a significant amount of new utility scale solar deployment. But really, it does not when the lengthy time period in which deployment will occur is considered. While calculations detailed below may vary somewhat with deployment, the Stipulation will likely result in less utility scale solar deployment from 2016-2019 than the 425 MWs of utility scale solar the Commission authorized in the 2013 IRP.[11] The Stipulation appears to approve only 375 MWs of utility scale solar deployment over the next three (3) years (2016 – 2018) -- 50 MWs less than the Commission approved in the 2013 IRP.

The Stipulation approves the Company's REDI program with a cap of 1200 MWs for all renewable development. The 1200 MWs are divided between 1050 MWs of utility scale resources and 150 MWs DG (both Stand Alone and Customer Sited). But, only one-half of the MWs allotted to utility scale Projects will be developed by the end of 2018, just before the next IRP in 2019 and commensurate with the expiration of the existing Investment Tax Credit ("ITC"). The 1050 MWs of utility scale renewable projects also include up to 300 MWs reserved for utility scale wind projects.

Taking the wind projects into account, utility scale solar is capped at 750 MWs to be deployed pursuant to two separate Requests for Proposals ("RFP") over six (6) years, 2016 – 2021, not three (3). If wind projects are deployed relatively evenly over the two

[9] T. 1501:17-21.
[10] *See generally*: T. 1501:14-17; T. 1516:17-1517:13; T. 1522:17-1523:15.
[11] In Re: Georgia Power Company's 2013 Integrated Resource Plan. *Supra* note 3 at 18.
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RFPs (150 MWs each), new utility scale solar projects will be capped at approximately 375 MWs until 2019. With 375 MWs of utility scale solar projects and 150 MWs of DG solar, 525 MWs of new solar generation will be deployed during the next three (3) years – the exact same amount approved in the 2013 IRP. The next 375 MWs of utility scale solar projects must await the second RFP in 2019 to be selected for deployment in 2020-2021. Just as they are completed, a third IRP will be pending in 2022.

Deferring one-half of utility scale solar projects until after 2019 jeopardizes the likelihood of their development for two significant reasons. First, the current ITC ends in 2019. Current law reduces the ITC annually to 10% in 2022 and continuing thereafter.[12] Based on prior experience when the previous ITC was about to expire, there is no way to predict whether the current ITC will be extended, reduced or eliminated.

Regardless, changes in the ITC will impact the economic viability of utility scale projects after 2019. This risk was well documented in testimony of the Georgia Large Scale Solar Association ("GLSSA").[13] While GLSSA proposed the two RFP periods, it strongly urged the Commission to authorize a substantially larger amount of utility scale solar before the ITC changes,[14] and GSEIA and VS agree.

Second, the initiation of a subsequent utility scale solar/renewable RFP while the 2019 IRP is proceeding simultaneously makes it very likely that consideration of additional utility scale solar in the 2019 IRP will be significantly curtailed and diminished. At the very least, any new utility scale generation resources approved will likely require an RFP that will not commence until 2022 – after the second round of projects approved now is complete and the third IRP is pending. So even if new utility scale generation is

[12] T. 1448:7-11.
[13] T. 1438:21-1440:18.
[14] T. 1451:22-1452:4; T. 1486:18-21.

authorized in the 2019 IRP, its development will probably be delayed until after 2022. For these reasons, GSEIA and VS cannot support Paragraph 3.

In light of the Stipulation, GSEIA recommends for the 2016 IRP that 300 MWs of utility scale wind be authorized separately from utility scale solar projects. The Commission should authorize a minimum of 750 MWs of utility scale solar to be competitively bid this year and deployed before December 31, 2018. With that schedule, the Commission will have a clean slate for consideration of additional utility scale solar in the 2019 IRP.

Paragraph 4 (Stand Alone Distributed Generation):

The Stipulation increases the amount of Stand Alone DG from 50 MWs (as proposed in REDI) to 100 MWs. Stand Alone DG is the only category of solar projects for which the Company proposes a real increase in deployment in the Stipulation, either from the 2013 IRP or its REDI proposal. Having proposed 250 MWs for Stand Alone DG, GSEIA and VS favor this increase, and it will result in great benefit for solar developers whose business plans focus on projects 1-3 MWs in size.

However, the Stipulation does not advance Stand Alone DG deployment based on geographic location. The value of strategic geographic placement of Stand Alone DG projects was documented in the Commission's workshop and in IRP testimony.[15] The Company noted the significance of project location in its IRP filing, specifically in "A Framework for Determining the Costs and Benefits of Solar Generation in Georgia" (the "Framework") as a factor in Reduced Transmission Losses[16] and Reduced Distribution Losses.[17] Location could also defer Deferred Transmission Investment Costs, which were

[15] T. 1523:21-1524:2.
[16] Framework, pp. 15-16.
[17] Framework, pp. 18-19.

not included in the Framework.[18] Despite these references, the Framework and the Cost/Benefit Analysis appear to address only system-wide impact.[19]

Stand Alone DG projects located closer to areas of greater demand and load have greater value to the Company. So, the value of their strategic geographic deployment should not be minimized. GSEIA and VS are concerned that under the Stipulation, REDI will continue deployment of Stand Alone DG in the same manner as in the Advanced Solar Initiative ("ASI") and ASI Prime, without advancing deployment criteria for Stand Alone DG properly valued and strategically located. For these reasons, GSEIA and VS cannot support Paragraph 4.

Paragraph 5 (Customer Sited DG):

The Stipulation continues to unnecessarily limit Customer Sited DG. Customer Sited DG does not fit well in the traditional regulatory model that previously relied on large generating plants to generate electricity to be transported to distant points of consumption. Customer Sited DG allows a customer to deploy generation facilities on site to reduce load, just like energy efficiency tools. The customer can also obtain service from the Company or one of several Georgia based private enterprise installers to evaluate the viability of solar deployment at their residential or commercial premises. If the customer decides to deploy solar, the customer can again choose between the Company or private enterprise companies to install and maintain their on-site facilities. But as more Customer Sited DG is deployed, Company revenues are potentially reduced.[20] However, these issues are not new to this Commission.

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[18] Framework, pp. 16-17. See also: IRP, Table 2, p. 10-104.
[19] Cost/Benefit Analysis, pp. 14-16.
[20] T. 382:5-384:2.

The Stipulation allots 50 MWs to Customer Sited DG -- the same amount the Commission approved in the 2013 IRP and the Company proposed in REDI. Customer Sited DG projects may range from 1 kW to 3 MW, sized up to 125% of the customer's load. GSEIA and VS support these changes, with caveat that the facility's capacity limit is measured in alternating current (AC) instead of direct current (DC) in compliance with O.C.G.A. § 43-3-62(2). However, GSEIA and VS anticipate that these changes will expire when the 50 MWs are deployed, returning customers back to the prior requirements that severely restricted their ability to deploy customer sited generation before REDI.

The Stipulation is unclear whether Customer Sited DG in REDI continues the Company's "Buy-All/Sell-All" requirement in ASI and ASI Prime or whether it will be a true behind the meter program.[21] It is also unclear whether this program is intended to replace the Company's Renewable Non-Renewable Tariff ("RNR") which the Company proposed in its IRP filing,[22] Hearing testimony confirmed that RNR is the only Company program that allows a customer to reduce their load dollar for dollar.[23] GSEIA and VS support the Company's proposal to eliminate the Green Energy Program and revise RNR to reflect true solar avoided costs.[24] But, these proposals are omitted from the Stipulation. Further, the Stipulation approves application fees from $3.00 to $9,000.00, depending on project size. While these fees are close to those in ASI Prime, GSEIA and VS contend that it is improper to charge a customer that wants to deploy Customer Sited DG to reduce their electric demand a fee to deploy facilities on their own property.

[21] Ms. Chiock testified that REDI will be "buy all/sell all" like ASI and ASI Prime. T. 382:23-393:2. But, the Stipulation is not clear.
[22] IRP, Section 10.5.1, p. 10-109.
[23] T. 388:14-25.
[24] The Company proposed similar changes for Qualified Facilities ("QF") under PURPA. GSEIA and VS support these changes as well. But, they are omitted from the Stipulation.

It is also unclear whether customers who contract with Georgia Power to deploy Customer Sited DG during the next three years fall within the 50 MW cap. They should, otherwise the Commission is allowing the Company to impose competitive restrictions that penalize its customers who choose private enterprise to install and maintain their systems. The Company should not be allowed to impose restrictions on its customers who choose to do business with the Company's competitors if the same limitation is not imposed on customers who choose the Company as their preferred installer.

The Commission and the Company know that GSEIA opposes an arbitrary cap restriction on the right of Company customers to deploy Customer Sited solar generation.[25] The customer's right to deploy solar generation on their property to offset their electric load is part of the customer's property rights which includes their right to make decisions regarding their electricity generation and usage. That right cannot be arbitrarily limited by the Company. If new, emerging technologies allow customers the choice to deploy solar facilities, they may do so as they – not the Company – choose. Georgia Power, a regulated monopoly, is not insulated or protected from the impact of technological advances that are available in a free market to its customers. No customer is required to purchase electricity from the Company, and the Company similarly is not protected by a guaranty that it will receive a specific amount of revenue.[26] The Company must adapt to market changes that allow customer choice just like any other enterprise.[27]

This Commission has never arbitrarily limited the right of customers of regulated utilities to deploy new, emerging technology. This Commission addressed very similar issues as competitive telecommunications services provided by third parties emerged

[25] T. 1514:5-17.
[26] T. 365:25-366:3.
[27] T. 366:4-9.

while BellSouth Telecommunications, Inc. ("BellSouth") was still a regulated monopoly. In fact, Customer Sited DG is the electricity equivalent of Customer Premise Equipment ("CPE") in telecommunications.[28] When telephone wires located inside the customers' home were designated as CPE, regulatory policy acknowledged the right of customers to deploy telecommunications facilities on their property as they decided. The Commission did not allow BellSouth to impose arbitrary caps on the rights of its customers to deploy new technologies, and the same rule should apply here for the benefit of Georgia Power customers. That does not mean that independent telecommunications providers did not engage in hard fought battles with BellSouth. It means that the Commission supported the right of the customers to make their own utility choice. For these reasons, GSEIA and VS strongly oppose Paragraph 5.

GSEIA and VS proposed a pilot program for Customer Sited DG up to a maximum of 250 MWs over the next three years with grid exports compensated at avoided costs.[29] This is a reasonable proposal, and it is unlikely Customer Sited DG deployment will reach that amount in the next three (3) years. There is a consensus that deployment will not occur all at once.[30] But if Customer Sited DG is deployed faster than expected, GSEIA and VS recommended that the Company, Commission Staff and industry stakeholders regularly review Customer Sited DG deployment and promptly address any issues resulting therefrom.[31] That recommendation is not referenced in the Stipulation.

Paragraph 6 (Portfolio):

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[28] See: *Furnishing of Customer Premises Equipment by the Bell Operating Telephone Companies and Independent Telephone Companies*; CC Docket 86-79, FCC 86-113 "Report and Order," Adopted November 25, 1986, Released January 12, 1987.

[29] T. 1524:4-19.

[30] T. 399:7-10.

[31] T. 1524:4-19.

GSEIA and VS do not object to consideration and approval of renewable project selection by portfolio analysis pursuant to standards approved by the Commission after appropriate input from all parties.[32] The Stipulation allows the Company to develop a "specific process that will be utilized for the evaluation" as part of the RFP documents. The better procedure would have the portfolio analysis criteria developed and approved by the Commission first. Then, the RFP process can start.

The Company's proposal to develop portfolio criteria using the RFP process highlights issues GSEIA and VS raised regarding the point at which the role of the Independent Evaluator ("IE") commences. The RFP process contemplated by the Stipulation means that Commission Utility Rule 515-3-4-.04(3) will apply to the development of criteria for portfolio evaluation long before the first bid can be considered, and it will encumber the ability of parties to effectively comment on the criteria developed by the Company. It only allows Company access to Staff, with contact between intervenors and Staff prohibited.[33] Counsel for the Company and counsel for stakeholders cannot talk to each other because every lawyer for the Company will be listed on the Evaluation Bid Team list as a person with whom communication is prohibited.[34] Also, documents filed by the Company as part of the RFP are not served on intervenors in the docket.

GSEIA and VS strongly support the vital role the IE performs to prevent the influence of any bidder in project selection in the RFP. But if the IE rule is invoked long before program guidelines are approved, long before Power Purchase Agreement

[32] T. 1520: 18-1521:12.
[33] Commission Utility Rule 515-3-4-.04(3)(c)(3).
[34] *See*: Georgia Power Company's Advanced Solar Initiative; Docket 36325. "Georgia Power Company's Evaluation Team List and Standards of Conduct for ASI and ASI Prime. (March 6, 2014).

("PPA") pro forma contract terms are finalized, and long, long before any bid is submitted and if counsel for intervenors are prohibited from speaking with counsel for the Company and the Commission Staff during preliminary processes leading to issuance of an RFP to actually take bids, there is a problem. If portfolio criteria are to be developed by the Company simultaneously with the RFP, GSEIA and VS cannot support Paragraph 6.

Paragraphs 7 and 8 (Renewable Cost Benefit Framework):

GSEIA and VS generally support the Company's Renewable Cost Benefit Framework (the "Framework"). GSEIA has consistently supported the development of a methodology that accurately calculates the Company's solar avoided cost savings to compensate for the excess generation exported from Customer Sited DG facilities since the 2013 IRP.[35] Therein, the Company represented that it had also considered similar methodology in calculating a price for ASI projects. Optimistic that the parties could agree on the components of (what the Company now calls) the Framework and a reasonable compensation rate for Customer Sited DG, GSEIA and VS filed a "Petition to Establish a Value of Solar" in 2014.[36] Two years later, the methodology and calculation of the Company's solar avoided cost savings remain elusive.[37] But, the substance of the Company's Framework still remains largely consistent (though more detailed) with the categories and criteria first proposed in 2013. The Company's work on the Framework is appreciated.

[35] Testimony of Karl R. Rabago, In re: Georgia Power Company's 2013 Integrated Resource Plan and Application for Decertification of Plant Branch Units 3 and 4, Plant McManus Units 1 and 2, Plant Kraft Units 1-4, Plant Yates Units 1-5, Plant Boulevard Units 2 and 3 and Plant Bowen Unit 6, Docket 36498 (July 17, 2013), *corrected by* Correction to Order, Docket 36498 (August 26, 2013).

[36] Petition to Establish the Value of Solar Energy, In re: Petition to Establish the Value of Solar Energy, Docket 38619 (July 10, 2014).

[37] Even in its IRP filing, the Company described the Framework only as a "recommended methodology" for use as a future guide, with results that are illustrative only and subject to revision at the Company's discretion. Framework at 2, 5-6 (Jan. 29, 2016).

The Framework is not perfect. But, given the pendency of this issue since the 2013 IRP, the Company should implement the Framework with revisions suggested by intervenors and Staff. The Framework should be finalized in four (4) months as proposed in Paragraph 7. But, finalization must involve input from the Company, the Commission Staff and stakeholders, not just the Company and Staff as stated in Paragraph 7. The final Framework must also include calculations to allow up to fifteen (15) year contract terms for Customer Sited DG at levelized avoided cost pricing. Though they want to see a methodology and calculation of the Company's solar avoided costs result from the Framework, GSEIA and VS cannot support Paragraph 7 for the reasons stated.

Compensation for export from Customer Sited DG facilities in Paragraph 5 and the evaluation of RFP bids in Paragraphs 3 and 4 are to be set based on Paragraph 8. Its provisions are problematic because the Company is allowed to select only those criteria from the Framework that it chooses to evaluate RFP bids in REDI and Customer Sited DG export compensation. The Stipulation also allows the Company significant discretion to assess costs and benefits on a case by case basis.

This is improper. When the Framework is finalized and when numbers for the Cost and Benefits have been calculated, Commission approval should be secured. GSEIA and VS recognize that the calculation of the Company's solar avoided cost savings will change over time. But, they cannot agree that unilateral changes by the Company are appropriate without Commission review and stakeholder input. It is not appropriate to exclude stakeholders from this process. For these reasons, GSEIA and VS do not support Paragraph 8.

Paragraph 11 (Self-Build):

The Stipulation approves 200 MWs for the Company's self-build projects to develop "additional renewable projects in collaboration with customers…" It authorizes 125 MWs for solar deployment at Georgia military bases, and not more than 75 MWs for non-military (presumably, commercial) customers. Paragraph 11 appears to approve some form of customer specific solar deployment, but it is not clear whether these projects will be customer sited or located off-site having some relationship to a specific customer. The Company may deploy its self-build projects for specific customers without competitive bidding if there is a "special public interest need." "Special public interest need" is not defined.

The Company did not request authority for any self-build projects in its IRP filing. Therein, the Company only reported on the status of its existing self-build military projects.[38] GSEIA and VS do not recall any Company testimony at the hearing requesting self-build projects. Therefore, there is no evidence in the record supporting Paragraph 11.

That said, GSEIA and VS support more solar deployment, and they have never objected to participation by the Company or its affiliates in prior solar generation solicitation programs. GSEIA and VS support the Company's involvement with solar development, as it competes with private enterprise -- with the caveat that guidelines protecting fair competition and a level playing field for all competitors must be in place.

The phrase "special public interest need" is not defined. GSEIA and VS acknowledge that solar deployment at military installations may fall within this exception due to national security and defense concerns. GSEIA and VS support the Company's military solar deployment. Another project identified in the IRP to which this exception

[38] IRP Filing, Section 10.9.3 (p. 10-120-121)

could apply is that proposed by The Ray to deploy solar generation in the median of Interstate 85 between LaGrange and West Point in conjunction with the Georgia Department of Transportation. GSEIA and VS support that project as well. Otherwise, few other utility scale projects should ever qualify under this exception.

The remaining 75 non-military MWs for which the Company seeks self-build authority should be added to the competitively bid utility scale projects in the RFP. The Company consistently urged that all projects (even down to Customer Sited DG) be competitively bid -- until now for its own self-build projects. Evidence from ASI Prime shows that private enterprise companies can succeed in competitive bidding head to head with the Company or its affiliates. If these utility scale projects are not competitively bid and the Company pays more for the electricity generated than will result from competitive bidding, the electricity is overpriced and Company ratepayers are paying too much for it. The Company's request directly contradicts its prior insistence for competitive bidding across the board. Therefore, GSEIA and VS cannot support Paragraph 11.

Paragraph 12 (Commercial and Industrial Program):

GSEIA and VS support a renewable Commercial and Industrial program, as requested by the Commercial Group.[39] But, the text of Paragraph 12 is very conditional. The Commission should direct the Company to evaluate a Commercial and Industrial Program and provide its analysis to the Commission for review. The Commission can then decide the policy it desires for a commercial and industrial program. Though GSEIA and VS support the Commercial Group's proposal and encourage the Company's development of a commercial and industrial program, they oppose Paragraph 12, as stated.

[39] T. 1410:14-1412:14.

Renewable Energy Task Force

The Stipulation is silent on the request of GSEIA and VS for the development of a Renewable Energy Task Force.[40] This omission is significant. GSEIA has always supported reasonable, gradual and market based deployment of renewable generation that will provide economic benefits to customers and customer choice in deployment. GSEIA supports policies that result in a fair and level playing field for private enterprise to compete with the Company to allow customer choice in generation options and usage. GSEIA also recognized that deployment of renewable DG resources may impact grid operations at some future level of deployment.

As a result, GSEIA hoped for a collaborative process including the Commission, its Staff, the Company and industry stakeholders to address renewable and solar issues. GSEIA approached the Company several times in an effort to negotiate and resolve many of the issues raised in this IRP pertinent to deployment of solar generation, with no response to date. The Stipulation provisions that state only the Company and Staff will confer[41] expand and continue that distance. Irrespective, GSEIA still believes that a cooperative, informal process to address and resolve issues arising from the deployment of renewable generation is the best way to proceed. While their willingness to continue to offer to work with the Company in every reasonable way possible continues, GSEIA and VS must now look primarily to the Commission to request the creation of the Renewable Energy Task Force to advance the goal of collaboratively developing and implementing solar policy and solar deployment for Georgia. The Renewable Energy

[40] T. 1524:4-19.

[41]

Task Force proposal is a reasonable proposal that is in the best interests of all parties and ratepayers. Its' creation should be included in the Stipulation.

This 29th day of June, 2016.

GALLOWAY & LYNDALL, LLP
Counsel for GSEIA and Vote Solar

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Newton M. Galloway
Georgia Bar No.: 283069
Terri M. Lyndall
Georgia Bar No.: 462235

The Lewis Mills House
406 North Hill Street
Griffin, GA 30223
(770) 233-6230 telephone
(770) 233-6231 facsimile
ngalloway@gallyn-law.com
tlyndall@gallyn-law.com

CERTIFICATE OF SERVICE

I certify that I have this day served a copy of the foregoing COMMENTS OF THE GEORGIA SOLAR ENERGY INDUSTRIES ASSOCIATION, INC. AND VOTE SOLAR IN OPPOSITION TO THE STIPULATION upon the following persons by causing electronic copies of the same to be transmitted to each interested party that has supplied a valid email address, and all other parties to be served via e-mail or first class mail with adequate postage affixed thereon and deposited in the United States Mail addressed as follows:

Mr. Reece McAlister
Executive Secretary
Georgia Public Service Commission
244 Washington Street, SW
Atlanta, GA 30334
reecem@psc.state.ga.us

Mr. Jeffrey Stair
Georgia Public Service Commission
244 Washington Street, S.W.
Atlanta, GA 30334
jeffreys@psc.state.ga.us

Ms. Jamie Barber
Georgia Public Service Commission
244 Washington Street, SW
Atlanta, GA 30334
jamieb@psc.state.ga.us

Mr. Blair Fink
Georgia Public Service Commission
244 Washington Street
Atlanta, GA 30334
bfink@psc.state.ga.us

Mr. Robert Trokey
Georgia Public Service Commission
244 Washington Street
Atlanta, GA 30334
rtrokey@psc.state.ga.us

Mr. Tom Newsome
Georgia Public Service Commission
244 Washington Street
Atlanta, GA 30334
tnewsome@psc.state.ga.us

Mr. Kevin Greene
Mr. Brandon Marzo
Mr. Steven Hewitson
Mr. Jack E. Jirak
Troutman Sanders, LLP
Bank of America Plaza
600 Peachtree St., N.E., Suite 5200
Atlanta, Georgia 30308-2216
kevin.greene@troutmansanders.com
brandon.marzo@troutmansanders.com
steven.hewitson@troutmansanders.com
jack.jirak@troutmansanders.com

Mr. G. L. Bowen, III
Mr. Charles B. Jones, III
Georgia Association of Manufacturers
The Hurt Building
50 Hurt Plaza, Suite 985
Atlanta, Georgia 30303
rbowen@gamfg.org
cjones@gamfg.org

Mr. Randall D. Quintrell
Randall D. Quintrell, P.C.
999 Peachtree Street, N.E., 27th Floor
Atlanta, Georgia 30334
randy.quintrell@sutherland.com

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

Mr. Kyle Leach
Director, Regulatory Affairs
Georgia Power Company
Bin 10230
241 Ralph McGill Boulevard, NE
Atlanta, GA 30308-3374
kcleach@southernco.com

Mr. Jim Clarkson
Resource Supply Management
1370 Walcora Drive
Sumter, SC 29150
jclarkson@rsmenergy.com

Ms. Anne G. Blair
Southern Alliance for Clean Energy
250 Arizona Avenue
Atlanta, Georgia 30307
anne@cleanenergy.org

Mr. Robert B. Baker
Freeman Mathis & Gary, LLP
100 Galleria Parkway, Suite 1600
Atlanta, Georgia 30339
bbaker@fmglaw.com

Mr. Robert Jackson
Greenlaw, Inc.
104 Marietta St. NW, Suite 430
Atlanta, Georgia 30303
rjackson@greenlaw.org

Mr. Zachary M. Fabish
Staff Attorney
The Sierra Club
50 F Street NW, 8th Floor
Washington, D.C. 20001
zachary.fabish@sierraclub.org

Mr. Kurt D. Ebersbach
Ms. Katie C. Ottenweller
Southern Environmental Law Center
The Candler Building
127 Peachtree Street, Suite 605
Atlanta, Georgia 30303-1840
kebersbach@selcga.org
kottenweller@selcga.org

Mr. D. Mark Baxter
Mr. Thomas T. McClendon
Stone & Baxter, LLP
577 Mulberry Street, Suite 800
Macon, Georgia 31201
Phone: (478) 750-9898
mbaxter@stoneandbaxter.com
tmcclendon@stoneandbaxter.com

Mr. Bruce Burcat
Mid-Atlantic Renewable Energy
Coalition
29 N. State St. Ste 300
Dover DE 19901
marec.org@gmail.com

Mr. Simon Mahan
209 Aspen Trail
Lafayette, LA 70507
info@southernwind.org

Mr. Alan R. Jenkins
Jenkins at Law, LLC
2265 Roswell Road, Suite 100
Marietta, GA 30062
aj@jenkinsatlaw.com

Ms. Liz Coyle
Georgia Watch
55 Main Street, Suite 903
Atlanta, GA 30303
lcoyle@georgiawatch.org

William Bradley Carver Sr. Esq.

Hall Booth Smith, P.C.
191 Peachtree Street NE
Suite 2900
Atlanta, GA 30303
(404) 954-5000
(404) 954-5020/Fax
bcarver@hallboothsmith.com

Robert Weaver
3516 Covington Highway
Decatur, Georgia 30032
Phone: 404-229-1211
Fax: 404-299-1288
rweaver@qcwdr.com

Mr. C. Dean Alford
Allied Energy Services LLC
1506 Klondike Road, Suite 105
Conyers, Georgia 30094

Mr. Michael Bradley
Sutherland, Asbill & Brennan, LLP
999 Peachtree Street NE
Atlanta, Georgia 30309
michael.bradley@sutherland.com

Mr. Joshua L. Belcher
Sutherland, Asbill & Brennan, LLP
1001 Fannin Street
Suite 3700
Houston, TX 77002
Joshua.belcher@sutherland.com

Mr. Cary Kottler
Clean Line Energy Partners, LLC
1001 McKinney
Suite 700
Houston, TX 77002
CKottler@CleanLineEnergy.com

Mr. Frank B. Strickland
Ms. Anne W. Lewis
Strickland Brockington Lewis, LLP
1170 Peachtree Street, NE
Suite 2200
Atlanta, Georgia 30309
fbs@sbllaw.net
awl@sbllaw.net

Ms. Allison Kelly Beaton
MZC Foundation, Inc. dba The Ray
1180 West Peachtree Street, NW
Suite 1975
Atlanta, GA 30309
allie@theray.org

This 29th day of June, 2016.

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Counsel for GSEIA and VS