STATE OF GEORGIA

BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION

In Re:		
Georgia Power Company's)	
Application for the Certification)	Docket No. 56258
of the Twiggs County Battery)	
Energy Storage System)	

DIRECT TESTIMONY OF

MATTHEW J. BOWERS, M. BRANDON LOONEY, AND MARC A. VINSON

JUNE 27, 2025

DIRECT TESTIMONY OF MATTHEW J. BOWERS, M. BRANDON LOONEY, AND MARC A. VINSON

IN SUPPORT OF GEORGIA POWER COMPANY'S APPLICATION FOR THE CERTIFICATION OF THE TWIGGS COUNTY BATTERY ENERGY STORAGE SYSTEM DOCKET NO. 56258

I.

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INTRODUCTION

2	Q.	PLEASE STATE YOUR NAMES, TITLES, AND BUSINESS ADDRESSES.
3	A.	My name is Matthew J. Bowers. I am the Integrated Resource Plan ("IRP") Project
4		Manager in Resource Planning for Georgia Power Company ("Georgia Power" or
5		the "Company"). My business address is 241 Ralph McGill Boulevard N.E.,
6		Atlanta, Georgia 30308.
7	A.	My name is Michael "Brandon" Looney. I am the Reliability Planning Manager for
8		Southern Company Services ("SCS"). My business address is 600 North 18th
9		Street, Birmingham, Alabama 35203.
10	A.	My name is Marc A. Vinson. I am the Program Development Manager for
11		Renewable Development at Georgia Power. My business address is 241 Ralph
12		McGill Boulevard N.E., Atlanta, Georgia 30308.
13	Q.	MR. BOWERS, PLEASE SUMMARIZE YOUR EDUCATION AND
14		PROFESSIONAL EXPERIENCE.
15	A.	I graduated from the University of Tennessee in 2012 with a Bachelor of Science
16		degree in Electrical Engineering. I began my career with SCS in 2010 as an
17		Engineering Co-op in Resource Planning. From 2013 to 2015, I was a System
18		Planning Engineer for SCS Resource Planning. From 2015 to 2017, I was an

1	engineer for the Project Analysis and Market Assessment team at Southern Power
2	Company. During this period, I earned a Master of Business Administration degree
3	with a Finance Concentration from Samford University in 2016. In 2017, I
4	transitioned to Georgia Power as a Planning Analyst in the Resource Policy and
5	Planning organization where I supported the 2022-2028 Capacity Request for
6	Proposals ("RFP") and the 2019 and 2022 IRPs. Beginning in 2022, I was promoted
7	to IRP Project Manager for the Resource Planning organization where I supported
8	the defense of the 2022 IRP and led the development and defense of the 2023 IRP
9	Update and the 2025 IRP. In my current role, I am also responsible for ensuring
10	compliance with all IRP Orders from the Georgia Public Service Commission
11	("Commission").

12 Q. MR. BOWERS, HAVE YOU PREVIOUSLY TESTIFIED BEFORE THE 13 **COMMISSION?**

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14 A. No. However, I will be testifying in the CARES 2023 Certification proceeding in 15 Docket No. 56181, which is being conducted in parallel with this proceeding.

MR. LOONEY, PLEASE SUMMARIZE YOUR EDUCATION AND 16 Q. 17 PROFESSIONAL EXPERIENCE.

I graduated from the University of Alabama in 2003 with a Bachelor of Science degree in Mechanical Engineering. I began my career at SCS in the Engineering and Construction Services organization. During this time, I completed my Master of Business Administration from the University of Alabama at Birmingham and received my Professional Engineering License from the state of Alabama. I moved to Research and Environmental Affairs in 2007 as a Research Engineer responsible for environmental control technology with a focus on compliance with the Mercury and Air Toxics Standards ("MATS"). In 2012, I became the Environmental Controls Research Manager responsible for Southern Company's technology research portfolio for air, land, and water pollutants.

1	In 2013, I transitioned to Southern Company's System Planning organization,
2	where I have held various leadership positions in several departments including
3	Asset Management, Renewable Generation Development, and Asset and
4	Environmental Planning. I moved into my current position in 2019, where I have
5	primary responsibility for Reliability Planning including the Reserve Margin Study
6	as well as the evaluation for the Company's numerous RFPs. In these roles, I have
7	supported each Georgia Power IRP dating back to 2016 as well as a number of
8	certification filings.

9 Q. MR. LOONEY, HAVE YOU PREVIOUSLY TESTIFIED BEFORE THE COMMISSION?

11 A. Yes. I recently testified before the Commission in Georgia Power's 2025 IRP 12 proceedings in Docket Nos. 56002 and 56003. In addition, I will be testifying in 13 the CARES 2023 Certification proceeding in Docket No. 56181.

14 Q. MR. VINSON, PLEASE SUMMARIZE YOUR EDUCATION AND PROFESSIONAL EXPERIENCE.

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A. I graduated from Georgia Institute of Technology in 2000 with a Bachelor of Science in Electrical Engineering. I began my career with Georgia Power in 1996 as an Engineering Co-op in Network Underground. From 2000 to 2006, I was a Senior Radio Frequency Engineer for Network Operations at T-Mobile USA. During this period, I earned a Master of Business Administration degree with a Finance Concentration from Kennesaw State University in 2006. In late 2006, I returned to Georgia Power as a Staff Profitability and Economic Analyst for the Market Planning team. From 2010 to 2011, I served as a Staff Financial Analyst for the Financial Analysis team where I participated as a member of the 2015 RFP Evaluation Team and led the revenue requirement analysis for the power purchase agreement ("PPA") bids. From 2011 until 2015, I served as the Manager for the SCS Costing and Energy Analysis team where I supervised a team of five analysts in the areas of cost of service studies, marginal cost analysis, and energy modeling.

1		For the next two years, I served as the Utility Scale Supervisor for the Renewable
2		Resources team where I oversaw development of the renewable section in Georgia
3		Power's 2016 IRP.
4		In 2017, I transitioned to Regulatory Affairs Manager where I served as regulatory
5		lead for the preparation, filing, and compliance of Georgia Power's 2019 and 2022
6		IRPs. From 2023 until 2025, I served as the Utility Scale Procurement Manager for
7		the Generation Procurement team where I provided strategic leadership to a cross
8		functional team responsible for the development and execution of system-wide
9		Public Service Commission-approved renewable power generation proposals. In
10		2025, I also served as the Capacity Procurement Manager until I transitioned to my
11		current role as Program Development Manager for the Renewable Development
12		team. In my current role, I am responsible for the development and implementation
13		of Georgia Power's renewable program strategy. I currently lead renewable
14		regulatory filings for new renewable programs and tariffs and develop and evaluate
15		new renewable business models, including profit and loss projections and risk
16		mitigations, to identify commercial opportunities.
17	Q.	MR. VINSON, HAVE YOU PREVIOUSLY TESTIFIED BEFORE THE
18		COMMISSION?
19	A.	No. However, I will also be testifying in the CARES 2023 Certification proceeding
20		in Docket No. 56181.
21	Q.	WHAT IS THE PURPOSE OF YOUR TESTIMONY?
22	A.	Our testimony is filed in support of Georgia Power's Application for the
23		Certification of the Twiggs County Battery Energy Storage System ("Application")
24		submitted pursuant to O.C.G.A. § 46-3A-4 and Commission Rule 515-3-407(2).
25		The Application, including the Engineering, Procurement, and Construction
26		("EPC") Agreement, the Battery and Equipment Supply Agreement ("BESA"), the
27		Activities and Critical Path Schedule, and the Solar Project PPA Amendment, was

filed on June 20, 2025. We wish to incorporate that filing by reference into this testimony.

Q. PLEASE SUMMARIZE YOUR TESTIMONY.

Our testimony supports Georgia Power's Application for the Certification of the Twiggs County Battery Energy Storage System ("BESS"). As explained below and in the Company's 2023 IRP Update proceeding, Georgia continues to be one of the fastest growing states in the country and is experiencing extraordinary economic development growth. To meet the needs of a growing Georgia and so that Georgia Power can continue to reliably serve customers, the Commission approved in its Order Adopting Stipulated Agreement in Docket No. 55378¹ ("2023 IRP Update Order") a balanced portfolio of resources that ensures Georgia Power can continue to meet the state's growing capacity needs. To address capacity needs in the Winter of 2027/2028, the Commission authorized the Company to conduct a narrowly tailored RFP on an expedited basis to procure between 300 and 500 megawatts ("MW") of BESS resources.

The Twiggs County BESS project, which was selected in Georgia Power's Winter 2027_2028 BESS RFP, is a reliable and economical resource that meets the resource criteria and capacity needs identified in the 2023 IRP Update. It will also provide several other benefits for customers. First, the project is co-located with an existing solar facility and will leverage existing transmission infrastructure. Second, the project will provide energy arbitrage benefits, which optimize energy savings for all customers by shifting the energy output from hours with a relatively low system marginal cost to hours with a relatively high system marginal cost.

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¹ Order Adopting Stipulated Agreement, Docket No. 55378 (April 26, 2024) ("2023 IRP Update Order").

1	In summary, the Twiggs County BESS project will produce real benefits for
2	Georgia Power's customers while helping to meet the Company's capacity needs
3	in the Winter 2027/2028 timeframe.

II. EVALUATION AND PROJECT SELECTION

Q. PLEASE DESCRIBE HOW THE COMPANY SELECTED THE TWIGGS COUNTY BESS PROJECT FOR CERTIFICATION.

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7 A. Georgia Power issued the Winter 2027_2028 BESS RFP, pursuant to Commission 8 Rule 515-3-4.04(3) ("RFP Rule"), to solicit bids from the market to meet a target 9 of between 300 and 500 MW. The Winter 2027_2028 BESS RFP was conducted 10 under the oversight of the Independent Evaluator ("IE") and Commission Staff, 11 which ensured that the resources were procured in the most efficient and transparent 12 manner. Consistent with the 2023 IRP Update Order, resources eligible for the 13 expedited RFP included four-hour BESS, sized 50 MW or greater, that required 14 minimal system upgrades, were interconnected to the Southern Company 15 Transmission System, were located within the state of Georgia, and were designed 16 to operate from Automatic Generation Control ("AGC"). Georgia Power selected 17 the Twiggs County BESS Project as a winning project following the Winter 18 2027_2028 BESS RFP.

19 Q. HOW DID THE COMPANY DETERMINE WHICH RFP PROPOSALS 20 PROVIDED THE BEST VALUE?

A. Georgia Power reviewed, evaluated, and ranked the RFP submissions by their total evaluated cost. The Twiggs County BESS project was selected as the best value resource for customers that could meet the narrowly tailored criteria of the Winter 2027_2028 BESS RFP. The IE and Commission Staff confirmed and approved the evaluation results.

1 Q. DID THE COMPANY PERFORM A COST BENEFIT ANALYSIS IN EVALUATING THE BID PROPOSALS?

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A. Yes. The Company conducted an in-depth economic analysis, including a cost-benefit evaluation, for the BESS projects that advanced to the Competitive Tier of the RFP process. The RFP evaluation model integrated the costs and schedules outlined in the BESA and EPC agreement provided for each proposal. Consistent with all RFP evaluations, the Company employed a rigorous cost-benefit analysis framework to systematically assess each project's financial and operational impacts by integrating detailed cost projects and implementation timelines. This analysis included a comprehensive review of direct and indirect costs, anticipated benefits, and potential risks associated with each proposal.

III. <u>BESS PROJECT OVERVIEW</u>

Q. PLEASE DESCRIBE THE TWIGGS COUNTY BESS PROJECT.

The Twiggs County BESS is a Company-owned, four-hour duration, 200 MW BESS located in Twiggs County, Georgia. It will be paired with the existing 200 MW Twiggs County solar facility, which has a PPA with Georgia Power that was certified by the Commission in Docket No. 40706. For this BESS project, Georgia Power executed a BESA with Tesla for the Megapack 2 XL, which is included in the Application as Appendix B. The Tesla Megapack 2 XL is a utility-scale energy storage solution from a leading supplier. It provides a modular design that allows for rapid deployment of BESS for high-capacity, large-scale projects. This solution provides unique benefits compared to other alternatives because it arrives at the site fully integrated and capable of outputting 480V alternating current ("AC") power. By utilizing the Tesla Megapack, the Company leveraged the expertise of a leading supplier to procure timely and reliable BESS equipment. A copy of the BESA is included in Appendix B to the Application.

1		The Twiggs County BESS project will serve as a dispatchable capacity resource
2		that provides customers with a reliable and economical source of electricity by the
3		Winter of 2027/2028. It will also be a critical part of the Company's diverse
4		generation portfolio, helping to ensure Georgia Power has the appropriate mix of
5		technologies to provide reliable and resilient electric service for its customers.
6	Q.	PLEASE PROVIDE AN OVERVIEW OF THE ENGINEERING,
7		PROCUREMENT, AND CONSTRUCTION PLAN FOR THE TWIGGS
8		COUNTY BESS PROJECT.
9	A.	The Company leveraged a previous Supply Chain RFP conducted for Company
10		BESS projects to select Crowder Industrial Construction, LLC ("Crowder") for the
11		Twiggs County BESS project based on its extensive experience in engineering and
12		construction. Pursuant to the EPC Agreement, which is included in Appendix A to
13		the Application, Crowder is responsible for the engineering, procurement, and
14		construction services necessary for the design and installation of the BESS.
15		Crowder is currently working on other certified Company-Owned BESS projects
16		that are currently on schedule and budget.
17		As mentioned above, Georgia Power executed a BESA for the Tesla Megapack
18		2XL. The Company will purchase the battery directly from Tesla under the BESA.
19		Crowder will deliver all services for a fixed price and will adhere to a detailed scope
20		of work and specifications set forth in the EPC Agreement. Experienced Company
21		personnel will provide oversight and ensure appropriate execution of the EPC
22		Agreement. The Company is highly confident in its ability to successfully execute
23		the Twiggs County BESS project.
24	Q.	HOW WILL THE PROPOSED TWIGGS COUNTY BESS PROJECT
25		BENEFIT CUSTOMERS AND GEORGIA POWER?
26	A.	The Twiggs County BESS project will benefit customers and the Company in

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several ways. The Company strategically selected the Twiggs County site for its

1		expedited deployment capabilities along with the ability to pair the BESS with the
2		existing solar facility. This strategic site selection allows the Company to leverage
3		existing transmission infrastructure, thereby eliminating the need to construct new
4		generator step-up ("GSU") project-level substations and eliminating potential
5		expenses and long lead time projects associated with interconnection and network
6		upgrades. In addition, it also offers expedited deployment capabilities and ensures
7		known transmission deliverability.
8		The Twiggs County BESS will be controlled by AGC signals and will store the
9		renewable energy generated during daylight hours and discharge it as needed to
10		support grid operations and to meet capacity needs. Therefore, the Twiggs County
11		BESS will optimize energy savings by shifting the energy from hours with
12		relatively low system marginal cost to hours with relatively high system marginal
13		cost. The Twiggs County BESS will primarily charge from the collocated solar
14		facility.
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15	Q.	WHAT IS THE ANTICIPATED COMMERCIAL OPERATION DATE FOR
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15 16 17 18 19 20	A.	WHAT IS THE ANTICIPATED COMMERCIAL OPERATION DATE FOR THE TWIGGS COUNTY BESS PROJECT? Georgia Power anticipates that the project will reach commercial operation November 1, 2027. Appendix C to the Application includes additional details regarding the proposed project schedule and timeline for the Twiggs County BESS project.
15 16 17 18 19 20	A.	WHAT IS THE ANTICIPATED COMMERCIAL OPERATION DATE FOR THE TWIGGS COUNTY BESS PROJECT? Georgia Power anticipates that the project will reach commercial operation November 1, 2027. Appendix C to the Application includes additional details regarding the proposed project schedule and timeline for the Twiggs County BESS project. WHY DIDN'T THE OTHER PROJECTS EVALUATED IN THE
15 16 17 18 19 20 21 22	A. Q.	WHAT IS THE ANTICIPATED COMMERCIAL OPERATION DATE FOR THE TWIGGS COUNTY BESS PROJECT? Georgia Power anticipates that the project will reach commercial operation November 1, 2027. Appendix C to the Application includes additional details regarding the proposed project schedule and timeline for the Twiggs County BESS project. WHY DIDN'T THE OTHER PROJECTS EVALUATED IN THE COMPETITIVE TIER ADVANCE TO CERTIFICATION?
15 16 17 18 19 20 21 22 23	A. Q.	WHAT IS THE ANTICIPATED COMMERCIAL OPERATION DATE FOR THE TWIGGS COUNTY BESS PROJECT? Georgia Power anticipates that the project will reach commercial operation November 1, 2027. Appendix C to the Application includes additional details regarding the proposed project schedule and timeline for the Twiggs County BESS project. WHY DIDN'T THE OTHER PROJECTS EVALUATED IN THE COMPETITIVE TIER ADVANCE TO CERTIFICATION? After the Company's evaluation was complete, Georgia Power determined that the

1 IV. **CERTIFIED COST AND COST RECOVERY** 2 Q. WHAT COST IS THE COMPANY ASKING THE COMMISSION TO 3 CERTIFY FOR THE TWIGGS COUNTY BESS PROJECT? 4 A. As shown in Figure 4.16 on page 9 of the Company's Application, Georgia Power 5 seeks Commission certification of the total in-service project cost of REDACTED, which includes the engineering, construction, oversight, and associated 6 7 procurement costs, financing cost, and ad valorem taxes. The Company requests 8 that the Commission certify the Twiggs County BESS project at its total projected 9 in-service costs. 10 Q. HOW DOES GEORGIA POWER PROPOSE TO RECOVER THE COST OF 11 THE TWIGGS COUNTY BESS PROJECT? 12 A. Georgia Power proposes to recover the costs associated with the construction of the 13 Twiggs County BESS project in rate base and will reflect the unit operating 14 expenses in its retail cost of service. Georgia Power requests that the Commission 15 approve the regulatory treatment consistent with the current treatment of Georgia 16 Power's other Company-owned retail generation facilities. 17 WHAT PROJECT COSTS WOULD THE COMPANY SEEK TO RECOVER Q. 18 SHOULD THE COMMISSION DECLINE TO CERTIFY THE BESS 19 PROJECT IN THIS APPLICATION?

Consistent with other project costs outlined in the 2023 IRP Update, if the

Commission rejects the Application, the Company would request that all costs

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1		incurred that are not useful or transferable to other potential projects be deferred to
2		a regulatory asset for recovery in the next base rate case. ²
3		V. CONCLUSION
4	Q.	IN CONCLUSION, PLEASE SUMMARIZE WHAT GEORGIA POWER IS
5		REQUESTING OF THE COMMISSION IN THIS APPLICATION.
6	A.	The Company requests that the Commission certify the 200 MW Twiggs County
7		BESS project as proposed in the Application. As set forth in the Company's 2023
8		IRP Update and recognized in the 2023 IRP Update Order, this BESS resource is
9		required to provide a cost-effective and reliable source of capacity and energy for
10		customers by the Winter of 2027/2028 and is in the public interest. Therefore,
11		approval of the Certification Application will help ensure Georgia Power can
12		economically and reliably meet customers' energy needs.
13	Q.	DOES THIS CONCLUDE YOUR TESTIMONY?
14	A.	Yes.

² See 2023 IRP Update Order Stipulation, Para. 7 ("Whether any incurred project cost not useful or transferable to other potential future projects shall be deferred to a regulatory asset for recovery in the next base rate case.").

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