

STATE OF GEORGIA
BEFORE THE
GEORGIA PUBLIC SERVICE COMMISSION

In the Matter of:)	
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)	
Georgia Power Company's Application for Decertification of Plant Branch Units 1 and 2 and Mitchell Unit 4C, Application for Certification of the Power Purchase Agreements with BE Alabama LLC from the Tenaska Lindsay Hill Generation Station and with Southern Power Company from the Harris, West Georgia and Dahlberg Electric Generating Plants and Updated Integrated Resource Plan)	Docket No. 34218-U

**POST-HEARING BRIEF OF
SOUTHERN ALLIANCE FOR CLEAN ENERGY, INC.**

Pursuant to Rule 515-2-1-.04 of the Georgia Public Service Commission ("Commission") and the Commission's January 11, 2012 Order Rescheduling Hearings, Southern Alliance for Clean Energy, Inc. ("SACE") respectfully files this post-hearing brief in the above-captioned proceeding.

INTRODUCTION

Georgia Power Company ("Georgia Power" or "the Company") has filed an application seeking approval of its plan to replace a significant portion of its coal capacity, which would either be retired next year or which is assumed unavailable beginning in 2015, with existing natural gas capacity secured through power purchase agreements ("PPAs"), and to install pollution control equipment on other coal-fired units. Specifically, the Company has requested

that the Commission decertify Plant Branch Units 1 and 2 and Plant Mitchell Unit 4C; certify four long-term PPAs for 1562 MWs of natural gas capacity; approve the Company's decision to begin baghouse installation work at ten coal-fired generating units; approve the 2011 update to the Company's integrate resource plan ("IRP"); and approve related accounting treatment requests.

The Company's application reflects the reality of the changing economics of supply-side generation in Georgia and across the nation. As the Company's Budget 2012 ("B2012") fuel forecasts show, coal prices are rising and gas prices are dropping. *See* Tr. at 615. Moreover, in light of current and forthcoming state and federal regulations, many coal-fired units will require installation of additional pollution control equipment to continue to operate as early as next year. And even for those that have longer compliance schedules, Georgia Power projects that it will take several years to design and install the necessary pollution controls. *Id.* at 54, 732. As a result, the Company must make decisions *now* concerning the future of its resource mix. *See* Georgia Power Exhibit GPC-2PD at 1 ("What is certain, however, is that the company must take steps *now* to prepare to deal with the challenges that these new regulations are expected to place on reliability in 2015.") (emphasis added).

The Company has taken a step in the right direction by proposing to retire two units that simply are uneconomic to continue to operate, as shown by the Company's unit retirement analysis, and one that has experienced major equipment failure. *Id.* at 63, 65. These decertification requests should be granted. Georgia Power has signed contracts for replacement capacity for these units and several others that are uneconomic to continue operating as coal-fired units in nearly all scenarios the Company evaluated in its unit retirement study.

However, the Company has also delayed critical planning decisions that should be made now to provide cost-effective resources for its customers. The Company is deferring its decision on whether to control, retire, or fuel-switch approximately 2600 MW of retail capacity, consisting mainly of coal-fired units (“the deferral units”).¹ *Id.* at 16-17. The Company assumes roughly 2000 MW of these deferral units will be offline as of 2015, and therefore will need to be replaced. *Id.* at 18. This is where the PPAs come in. In light of decreases in forecasted load, the Company determined that the proposed retirements of roughly 500 MW and the assumed unavailability of 2000 MW creates a need for approximately 1200 MW in 2015. *Id.* at 23; Tr. at 108. Yet, the Company seeks to add the 1562 MW of PPA capacity—362 MW in excess of the capacity deficit—without removing the vast majority of the capacity the PPAs are intended to replace, thereby creating a risk of significant excess capacity and excess ratepayer burden.

The Company should mitigate this risk. If the PPAs are certified, Georgia Power should seek to retire the capacity that its own retirement study shows is uneconomic to control or fuel-switch. At a minimum, the Company should provide the Commission with a clear timeline for making these important decisions. Indeed, Public Interest Advocacy Staff witness Randall J. Falkenberg explained that certification of the PPAs further strengthens the economic case for retirement, Tr. at 350, and further delay only adds to the risk of increased ratepayer cost.

The Company should also update the Commission on whether it intends to terminate the PPAs prior to the final decision date in this docket. This will reduce the likelihood that ratepayers will have to pay the termination fee.

¹ The “deferral units,” which the Company analyzed in the following blocks, are Plant Branch Units 3 and 4, Plant Yates Unit 1; Plant Yates Units 2-5; Plant Yates Units 6-7; Plant Kraft Units 1-4; Plant Mitchell Unit 3; Plant McIntosh Unit 1 and Plant McManus Units 1 and 2. Georgia Power Exhibit GPC-2PD at 17.

Finally, the Company should correct the flaws in its unit retirement analysis. The methodology and inputs used in the study were improperly skewed to favor continued operation. Despite this, the analyses demonstrate that it is not economically to ratepayers for Branch Units 1 and 2, and the units assumed unavailable beginning in 2015, to operate as coal-fired units. This analysis should be corrected to facilitate the Company's decision-making process concerning the deferral units, which would likely result in an even stronger case for retirements.

LEGAL FRAMEWORK

The Commission's review of Georgia Power's application in this case is governed by the Integrated Resource Plan Act, O.C.G.A §§ 46-3a-1 *et seq.* (2011). Pursuant to O.C.G.A. § 46-3A-3, utilities must obtain a certificate of public convenience and necessity ("certificate") from the Commission prior to entering into a long-term purchase of electric power. *See* Ga. Comp. R. & Regs. r. 515-3-4-.07. The Commission issues a certificate if it determines that proposed capacity resource is needed "to assure an economical and reliable supply of electric power and energy and that the certificate is required by the public convenience and necessity." O.C.G.A. § 46-3A-4(a). The utility's application for a certificate must be accompanied by its current IRP, whether or not previously filed, and must contain a cost-benefit analysis covering the estimated useful life of all capacity resource options considered in developing the IRP. *Id.* § 46-3A-4 (b) and (c); *see also* Ga. Comp. R. & Regs. r. 515-3-4-.06(5)(a).

The Commission may examine and revoke a certificate, upon application of a utility or upon its own motion, if it determines that a resource is no longer needed. O.C.G.A. § 46-3A-6.²

² Georgia Power has requested decertification of Plant Branch Units 1 & 2 and Plant Mitchell Unit 4C pursuant to O.C.G.A. § 46-3A-6. *See* Georgia Power Exhibit GPC-2PD at 63. However, in its Procedural and Scheduling Order, the Commission referred to O.C.G.A. §46-3A-3 (b) as the applicable statute for the decertification request. O.C.G.A. §46-3A-3 (b) provides that utilities must obtain a certificate or an amendment to a certificate, as appropriate, before increasing or decreasing the capacity of an electric generating unit. Because the Company seeks

The Commission will determine whether the Company's decertification request should be granted in this case based on "[t]he appropriateness of the Company's analysis within its Unit Retirement Study," which is provided as part of the IRP update. Procedural and Scheduling Order at 3.

ARGUMENT

I. Plant Branch Units 1 and 2 and Mitchell Unit 4C should be decertified and retired.

The Company's analysis shows that retiring Branch Units 1 and 2 is best option for ratepayers across a wide range of economic scenarios. In fact, the updated retirement study favored replacing rather than controlling the units in eight of the nine scenarios studied. *See* Georgia Power Exhibit GPC-4TS at 6.³ Although the unit retirement analysis contains several flaws, as outlined in Part III, these flaws err in favor of continued operation of the units. A revised study that corrects these errors would likely provide an even stronger case for retirement.

Based on impending state and federal regulations, continuing to operate these coal-fired units would require significant investments in pollution controls that could take roughly five years to install. *Tr.* at 282. Under the Georgia Multipollutant Rule, Branch Units 1 and 2 must have Selective Catalytic Reduction ("SCRs") and flue gas desulfurization ("scrubbers") equipment in place by December 31, 2013 and October 1, 2013, respectively. The unit retirement study shows that investment in these controls is not in the best interests of the

to decertify rather than decrease the capacity of Branch Units 1 and 2 and Mitchell 4C or otherwise amend those certificates, O.C.G.A. § 46-3A-6 appears to govern.

³ The numerical value, and relative magnitude thereof, associated with each scenario in the unit retirement study and updated study is designated "trade secret." However, Georgia Power has indicated that it does not object to SACE discussing the study's results in terms of the economic benefits to customers of controlling and operating or retiring and replacing a given unit as indicated by the number of scenarios that show positive or negative results.

ratepayers. Indeed, the Company proposed retirement dates of the units coincide with the applicable Multipollutant Rule compliance deadlines. Witnesses for Staff and SACE agree with the Company's proposal and recommend retirement. *Id.* at 327, 537. Accordingly, the Company's decertification request should be granted and Branch Units 1 and 2 should be retired.

Georgia Power also determined that the retirement of Mitchell Unit 4C, which would require significant investments in equipment repair to continue operations, is the best economic option. Georgia Power Exhibit GPC-2PD at 3. Mitchell Unit 4C is a 33 MW oil-fired combustion turbine ("CT") that commenced operations in 1971. This unit experienced significant equipment failure in late 2009, which has not been repaired. In light of this failure, and considering several other factors, including the age of the unit, repair challenges, and the potential for additional environmental requirements, the Company has requested decertification. The Commission should grant the Company's decertification request for this unit.

II. The Company should mitigate the risks to ratepayers posed by the PPAs.

The Company has entered into four long-term PPAs, each spanning approximately 15 years, for a total of 1562 MW of natural gas capacity. *Id.* at 25. The Company asserts that these PPAs represent the best option to help ensure economic, reliable electric service beginning in 2015 and beyond. *Tr.* at 43. However, the Company's plan actually exposes ratepayers to risks of increased costs. The Company has requested certification of the PPAs based on the proposed retirements at Plant Branch and Mitchell *and its assumption that more than 2000 MW of uncontrolled coal capacity will be "unavailable" beginning in 2015.*⁴ *Id.* at 63, 730-31. As

⁴ A unit is assumed to be "unavailable," according to the Company, if it would not have the required pollution controls by the anticipated deadline set by the Mercury and Air Toxics Standards ("MATS" or "Utility MACT Rule") and therefore would be unable to operate thereafter. *Tr.* at 278. Although the Company defines "unavailable" only in relation to the Utility MACT Rule, the Georgia Multipollutant Rule carries a 2015 compliance deadline. Specifically, Plant Branch Units 3 and 4 must have SCRs and scrubbers in place by October 1, 2015 and December 31, 2015, respectively, pursuant the state rule.

Company witness Garey C. Rozier testified: “[I]f we only retired the 500 megawatts that we are requesting to retire, there wouldn’t be a need [for the PPAs]. So the need is then created by the other capacity that is assumed deferred and unavailable.” *Id.* at 116.

At the same time, however, the Company has deferred its decision on whether to retire these unavailable units. As with Plant Branch Units 1 and 2, for many of these units, the Company’s own analysis strongly indicates that retirement is the best economic option. Yet the Company has refused to commit to the predicate for its certification request. This lack of commitment exposes ratepayers to the risk of excess cost. To mitigate this risk, the Company should commit to additional retirements or a deadline by which it will make its decisions on the deferral units.

Additionally, in light of the final issuance of the MATS and its publication in the Federal Register, the Company should update the Commission on its intent to exercise the early termination option prior to March 20, 2012, when the Commission will issue its final decision in this case.

A. The Company should commit to retire the uneconomic units the PPAs are designed to replace.

The Company’s plan to add 1562 MW of capacity through the PPAs stems from the results of its unit retirement study. The Company’s unit retirement study compares the costs to ratepayers of controlling and replacing certain coal- and oil-fired units across multiple natural gas and carbon dioxide price scenarios. Georgia Power Exhibit GPC-2PD at 34-37. A positive value for a given scenario indicates that controlling and continuing to operate the unit is the better economic option for ratepayers, and a negative value indicates that retiring and replacing the coal unit is the better economic option for ratepayers. *Id.* at 38; Tr. at 267. Based on this analysis, Georgia Power concluded that it would retire Branch Units 1 and 2 and that it would

assume that of the deferral units, approximately 2000 MW will be unavailable for operations beginning in 2015.⁵ Georgia Power Exhibit GPC-2PD at 18.

Based on these conclusions, the Company identified a need for 1200 MW of capacity and selected four fifteen-year PPAs totaling 1562 MW through the RFP process. *Id.* at 23. As PIA Staff Witness Philip M. Hayet testified, in light of the identified need, the acquisition of 1562 MW in PPAs will create excess capacity for a few years. *Tr.* at 400. PIA Staff recommends that the Commission reject at least one of the PPAs totaling 564 MW to protect ratepayers from this extra cost burden. *Id.* at 403. Excess capacity risks are even greater if the PPAs do not actually replace most, if not all, of the “unavailable” capacity. Put simply, if the PPAs are certified and go into effect,⁶ the Company will have locked in a significant amount of capacity for the next 15 years. By failing to make a decision on these deferral units, the Company has exposed ratepayers to the risk of paying not only for the PPAs but also paying the bill for the uneconomic capacity that the PPAs are intended to replace. *Id.* at 554.

The Commission should mitigate this ratepayer risk by conditioning approval of the PPAs on additional retirement of capacity that is uneconomic to control, as supported by the retirement study. *See* Georgia Power Exhibit GPC-4TS at 8-18. The retirement study shows that of the 36 scenarios in which the costs of controlling and continuing to operate a deferral coal-fired unit were compared to replacement with a combined cycle (“CC”) unit, retirement and replacement was the better economic option for ratepayers in 33 scenarios, *i.e.* 33 scenarios have negative values.⁷ *Id.* at 8-15. For example, retiring and replacing Plant Branch Units 3 and 4 is

⁵ Based on the Amended Application, the units assumed unavailable units are Plant Branch Units 3 and 4; Plant Yates 1; Plant Yates 2-5; Plant Kraft Units 1-4 and Plant McIntosh 1. *Tr.* at 617; Georgia Power Exhibit GPC-2PD at 18.

⁶ Georgia Power could exercise an early termination option. *See infra* Part II.B.

⁷ The 36 scenarios include nine scenarios for each of the following blocks: Plant Branch Units 3 and 4; Plant Yates Unit 1; Plant Yates Unit 2-5 and Plant Yates Unit 6 and 7. The Company did not evaluate whether units at Plant

the better economic option in eight of the nine scenarios studied—the same amount as for Units 1 and 2—and replacing Yates Units 1 and Units 2-5 is the better economic option *in all of the scenarios* analyzed. *Id.* at 8, 12-15. Accordingly, the Commission should condition approval of the PPAs on these retirements.

In the alternative, the Commission should require the Company to develop a timeline for deciding whether to retire, fuel switch or control the deferral units. The Company has testified that it could take approximately five years to complete a single scrubber installation, and multiple simultaneous installations could take “considerably longer.” Tr. at 282. The Company has also testified that, based on experience at Plant Scherer, baghouse installations could take five or six years. Tr. at 54. Therefore, if Georgia Power does retrofit these units, which would create added ratepayer burden on top of the cost of the PPAs, deferring this decision makes timely retrofits impossible or exposes ratepayers to far higher costs to expedite last-minute retrofits.

B. The Company should provide clarity concerning the early termination option.

Another potential added ratepayer cost is the early termination option of the PPAs. According to this provision, the Company could cancel any or all of PPAs by March 27, 2012 and ratepayers would have to pay a termination fee of \$20 per kW. Georgia Power Exhibit GPC-2PD at 26; Tr. at 144. If all of the PPAs are cancelled, the termination fee would total approximately \$31 million. Tr. at 140. The Commission is scheduled to render a final decision on the PPAs on March 20th. Procedural and Scheduling Order at 5. Therefore, if the Commission certifies the PPAs, the Company will have a one-week window in which it could

Kraft and McIntosh should continue to operate as coal fired. Instead, Company compared fuel-switching these units to replacing them with a combustion turbine (“CT”) proxy. Georgia Power Exhibit GPC-4PD at 16-19. Plant Yates Units 6 and 7 were also analyzed for fuel switching, which yielded positive values in all scenarios. Georgia Power Exhibit GPC-4TS at 27.

terminate the PPAs. To mitigate the risk of ratepayers paying the termination fee, the Company should update the Commission as to whether it intends to exercise the termination option.

Mr. Rozier testified that the early termination option could only be exercised in two instances related to the stringency and compliance deadlines of the final MATS rule. Tr. at 145-46. Prior to the issuance of the final rule, Mr. Rozier asserted that use of the termination option is “unlikely to occur.” *Id.* at 87. Mr. Rozier later testified at the rebuttal hearing, which occurred after the final rule was issued, that he does not believe the situation has changed, and the Company will take the appropriate action based on the information it has on March 27th. *Id.* at 729. Mr. Rozier also noted that the final MATS rule had not yet been published in the Federal Register, and the Company will study the rule when it is published but does not “expect any substantive differences” from the pre-publication version. *Id.* at 729-30.

The final Utility MACT Rule was issued on December 21, 2011, and was published in the Federal Register on February 16, 2012. *See* 77 Fed. Reg. 9,304 (Feb. 16, 2012). Thus, the Company should be able to determine whether it will terminate the PPAs before the final decision is issued in this case on March 20th. To mitigate the risk to ratepayers of paying the early termination fee, the Company should report to the Commission whether it intends to terminate the PPAs prior to March 20th.

III. Georgia Power’s Unit Retirement Study is Flawed And Should Be Corrected.

As previously discussed, the Company’s unit retirement study is a critical part of its IRP update and forms the basis for the Company’s requests in this case. As the driver of important resource decisions, the retirement study must be accurate and unbiased. However, as SACE witness David A. Schlissel explained in his testimony, the Company’s study suffers from flaws

that bias the results in favor of continued operation of coal-fired units. Even so, all but one economic scenario favor replacing and retiring Branch Units 1 and 2, and the vast majority of the scenarios that compare continued coal-fired operations of the deferral units to replacement show that replacement is the better economic option. *See* Georgia Power Exhibit GPC-4TS at 6-15. In light of decisions the Company must make concerning approximately 2600 MW of capacity, the study's flawed methodology and underlying assumptions must be corrected.

A. The study relies on unreasonable fuel price assumptions.

The range of natural gas prices used in the study is too high and should be reduced to a more reasonable range. In his testimony, Mr. Schlissel compared the Company's natural gas price forecasts (low, medium and high) to the NYMEX futures prices and AEO2011 forecasts, and concluded that the Company should lower its prices assumptions. Tr. at 537, 541. PIA Staff witness Hayet also testified that the gas price forecasts are generally too high. *Id.* at 410. Instead of using the Company's forecasts, Staff used a low forecast it developed in the Fourth Vogt Construction Monitoring Report docket and used the Company's Low and Moderate forecasts as the Moderate and High forecasts, respectively. *Id.* at 414. Staff's approach presents a more realistic price range for natural gas than that utilized by the Company, and is a step in the right direction.

Although the Company disagrees with the analyses of Mr. Schlissel and Mr. Hayet, its B2012 fuel forecast data reflects a lower range of forecast prices as compared to the previous year. As the Company notes, this decrease is part of a multi-year trend of lower forecasted gas prices. Tr. at 615. By incorporating the B2012 forecasts, the unit retirement update includes more realistic assumptions about natural gas pricing, and shows that operation of existing uncontrolled coal plants is even less economic than shown in the Company's initial study.

However, the price range remains too high as compared to other forecasts and should be lowered.

Additionally, the coal price forecasts used in the study fail to account for the potential for significantly higher coal prices. As Mr. Schlissel testified, the combination of increasing exports of U.S. coal and resource depletion is expected to lead to upward pressure on coal prices. Tr. at 546-47. The Company did not refute Mr. Schlissel's conclusion on increasing coal prices and the Company's B2012 fuel forecasts support this analysis. Accordingly, the Company should use a wider range of potential coal prices, including higher prices, in its retirement analysis.

B. The study fails to reflect the performance- and cost-related risks associated with continued operation of aging coal-fired units.

Georgia Power failed to provide any evidence to support its assumption that each unit evaluated in its retirement study will operate until 2040 without experiencing any decrease in performance capability or increase in cost beyond the rate of inflation. Georgia Power Exhibit GPC-2PD at 34-35. Moreover, the retirement study's blanket assumption of continued operations through 2040 is in stark contrast to the Company's 2010 Depreciation Study. These assumptions concerning the continued operation of aging coal plants cannot stand, and the study should be revised to account for the significant performance and cost uncertainty associated with operating these units for nearly 30 more years. Tr. at 550-51.

The units evaluated in the retirement study began operations between 1950 and 1979. Thus, in 2040, at the end of the assumed operating life, these units will range in age from 61 to 90 years. For example, Plant Branch Units 3 and 4 will be 71 and 72 years old, respectively, and Plant Yates Units 1 through 7 will range from 66 to 90 years old. It is unrealistic to assume that these units will not degrade as they age well into their 60s and beyond. Indeed, in its 2010

Depreciation Study, Georgia Power assumed that no plant would operate beyond its 65th year.⁸ Specifically, in the 2010 study, the Company assumed a life span of 65 years for controlled coal-fired units; 55 years for Plant Branch and Plant Yates Units 6-7; and assumed that Plant Yates Units 1-5 would retire in 2014. These assumptions, made just two years ago, are significantly different than the assumptions the Company now asks the Commission to accept.

Currently, the oldest operating coal-fired unit of at least 100 MW is in its early 60s. Tr. at 550. Accordingly, the extent to which operating performance will degrade and O&M costs will increase as units age beyond their early 60s is uncertain. This uncertainty cannot be ignored because the cost of degrading and inoperable units will fall to ratepayers. Thus, the retirement analysis should incorporate performance and cost uncertainty in its assumptions so that the economic evaluations reflect the true cost of continuing to operate these units.

C. The Study fails to account for the selected PPA capacity.

The Company selected four PPAs for natural gas capacity to replace the capacity of the retired units and the units assumed unavailable beginning in 2015. However, the retirement study does not actually compare the cost of controlling these units to replacing them with equivalent capacity from the PPAs. Instead, the study compares the cost of controlling or fuel switching a unit to the cost of a hypothetical self-build replacement, either a CC unit or CT, respectively. Georgia Power Exhibit GPC-4PD at 4. The PPAs are a lower cost option as compared to a self-build option. See Tr. at 345; 551. Indeed, the Company submitted several self-build proposals during the RFP process, but those bids were not determined to be the most

⁸ Georgia Power Company *Depreciation Rate Study As of December 31, 2008*, prepared by American Appraisal at 8, Georgia Public Service Commission Docket No. 31958 (filed on July 1, 2010).

economic option for replacement capacity. Tr. at 100. Therefore, an analysis that evaluates the cost of the winning bids, the PPAs, rather than a hypothetical self-build option would be more accurate, and the Company should have conducted such a study in this case.

The Company asserts that the full evaluations of the PPAs were not complete when it conducted the retirement analysis and that there is no significant difference between the marginal costs of the PPAs and the self-build option used in the study. Tr. at 297-98. However, the Company could have and should have provided this comparison in its retirement study update, which was prepared and filed after PPAs were executed. Moreover, the cost difference between the PPAs and the self-build option—regardless of the magnitude—requires the Company to prepare an accurate study that reflects the replacement option it selected. Stated simply, the Company has prepared a study to justify its proposed plans but the study does not accurately reflect those plans.

These four flaws in the unit retirement study favor continued operations of coal-fired capacity. Although the study nonetheless supports the retirement of Branch 1 and 2 and the unavailability assumptions, it is important to have an accurate economic evaluation of Georgia Power's coal-fired units, particularly in light of the resource decisions the Company has yet to make. Accordingly, the Commission should direct the Company to correct these flaws.

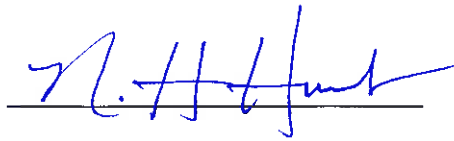
CONCLUSION

Based on the evidence in the record, and for the reasons discussed herein, SACE respectfully requests the Commission take the following action in this case:

- Grant Georgia Power's request to decertify and retire Plant Branch Units 1 and 2 and Plant Mitchell Unit 4C.

- Condition certification of the PPAs on the retirement of the deferral units that are assumed unavailable beginning 2015 and are uneconomic to continue to operate. Alternatively, require Georgia Power develop and submit to the Commission a timeline for deciding whether to retire the deferral units that would also be made available to PIA Staff and the public for review and comment.
- Direct the Company to report to the Commission whether it intends to terminate the PPAs prior to March 20, 2012.
- Direct the Company to correct the flaws in its unit retirement analysis.

Respectfully submitted this 28th day of February, 2012.



FOR

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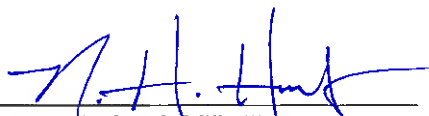
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CERTIFICATE OF SERVICE

I certify that on the 28th day of February, 2012, that the Post-Hearing Brief of Southern Alliance for Clean Energy has been served upon the parties listed below via electronic service and by depositing the same, postage prepaid, in the United States Mail:

This 28th day of February, 2012.



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