



June 2, 2020

Via Electronic Filing & Express Mail

Reece McAlister
Executive Secretary
Georgia Public Service Commission
244 Washington Street, SW
Atlanta, GA 30334

**Re: Docket No. 42310 Georgia Power Company's 2019 Integrated Resource Plan and
Docket No. 42311 Georgia Power Company's 2019 Demand Side Management Plan:
Consideration of Georgia Power's Income Qualified Tariff Based Energy Efficiency
(IQTBEE) Pilot Filing**

Dear Mr. McAlister:

In accordance with the Order Adopting Stipulation as Amended filed by the Commission on July 29, 2019 in the above referenced dockets, on April 1, 2020 Georgia Power Company filed a Plan for implementing the IQTBEE Pilot for Commission approval. In this filing, Georgia Power included terms and conditions for the Pilot, and the IQTBEE-1 tariff. With small adjustments, this matter was approved by the Commission on May 7. Sierra Club is in support of the Plan, and wishes to both offer commendation for adoption of the Pilot, while offering some additional recommendations.

As you know, Sierra Club has been an ongoing participant in the Demand Side Management working group meetings that have considered a number of important program design measures related to energy efficiency. The Pilot program was a popular topic of conversation in those working group meetings, and we greatly appreciate the hard work from Georgia Power and Commission Public Interest Advocacy Staff to address matters that arose during the 2019 IRP hearings regarding the efficiency and effectiveness of program design and implementation.

We believe the Pilot that was adopted is both laudable and adequate, but should also be the foundation for a more ambitious approach benefitting more households. While this Pilot will benefit 500 households currently experiencing high energy burdens in Atlanta and Athens, we are hopeful that, pending positive observed results, it will be swiftly expanded to benefit tens of thousands of such households. The need across Georgia is great. The COVID-19 pandemic and subsequent economic disaster has only amplified that need. Many lower-income utility customers will benefit from improved energy efficiency of their homes and lowering their power bills, but upfront costs often put such improvements out of reach. This Pilot should benefit customers historically under-represented by home efficiency improvement programs.

In addition, on bill tariffs can be a financing mechanism and a capital formation tool for a variety of clean energy ideas beyond energy efficiency, including distributed solar resources and electric vehicles. We are optimistic that voluntary on bill tariffs can be an engine for innovations benefitting ratepayers across Georgia.

For the above reasons, Sierra Club believes the Pilot Plan as adopted on May 7 is a step in a process and we support an ambitious expansion of this program in future IRP cycles.

Respectfully submitted,



Stephen Stetson
Campaign Representative,
Beyond Coal Campaign
Sierra Club



Jessica Morehead,
Chapter Director,
Georgia Sierra Club