



Southern Renewable Energy Association

P.O. Box 14858, Haltom City, TX 76117

September 27, 2019

Mr. Walter L. Thomas, Jr.
Executive Secretary
Alabama Public Service Commission
100 North Union Street
P.O. Box 304260
Montgomery, AL 36130

Re: Alabama Power Company Petition for a Certificate of Convenience and Necessity, Docket 32953

Dear Mr. Thomas,

Please find enclosed the Southern Renewable Energy Association's Petition to Intervene in the referenced docket. This filing will be accompanied by requisite number of physical copies to the above address.

Sincerely,

Simon Mahan
Executive Director
Southern Renewable Energy Association
PO Box 14858
Haltom City, TX 76117
simon@southernwind.org
(337) 303-3723

BEFORE THE

ALABAMA PUBLIC SERVICE COMMISSION

For a certificate of convenience and necessity for: (i) the construction and installation of combined cycle generating capacity at the site of Petitioner’s Barry Steam Plant located in Mobile County, Alabama; (ii) the acquisition of existing combined cycle generating capacity in Autauga County, Alabama; (iii) the acquisition of rights and the assumption of payment obligations under a purchased power agreement for the output of combined cycle generating capacity operated in Mobile County, Alabama; and (iv) the acquisition of rights and the assumption of payment obligations under purchased power agreements for the output from five solar photovoltaic and battery energy storage systems, located in Calhoun, Chambers, Dallas, Houston and Talladega Counties; together with all transmission arrangements, structures, substations, and facilities, environmental control measures, facilities or arrangements for the handling, treatment, transportation, delivery and processing of fuel, and any and all other appliances, appurtenances, facilities, rights, equipment, acquisitions, commitments and accounting authorizations necessary for or incident thereto.

Docket No. 32953

APPLICATION FOR LEAVE TO INTERVENE OF SOUTHERN RENEWABLE ENERGY ASSOCIATION

COMES NOW, the Southern Renewable Energy Association (“SREA”), pursuant to Rule 8 of the Rules of Practice of the Alabama Public Service Commission, hereby files this

Application for Leave to Intervene (“Application”) in the above-referenced docket. In support hereof, SREA respectfully shows as follows:

1.

On September 6th, 2019, Alabama Power Company (“Alabama Power”) filed a petition for a Certificate of Convenience and Necessity (CCN) for construction and installation of combined cycle (“CC”) generating capacity, acquisition of existing CC units, acquisition of rights under a purchased power agreement (“PPA”), acquisition of PPA’s from five solar photovoltaic and battery energy storage systems, along with affiliated facilities, as listed in Docket No. 32953.

2.

SREA is a recognized Internal Revenue Service (IRS) Section 501(c)(6) regional trade association that works to promote the responsible development and use of utility-scale wind energy, energy storage, solar energy and transmission throughout the South. Alabama is one of eleven states in which SREA works. SREA believes that the Alabama Power service territory market for utility-scale wind energy, energy storage, solar energy and transmission, is large enough to incorporate significant quantities of these resources. SREA members have a vital interest in the pending dockets inasmuch as its members develop and deploy facilities to generate and produce energy.

Pursuant to the Code of Alabama § 37-1-87, “[e]very person, firm, corporation, copartnership, association, or organization affected thereby may by petition intervene and become a party to any proceeding before the commission.” The Commission’s actions in this docket will affect development, deployment, or use of the various energy resources in the region and thus will affect the investment decisions made by members of SREA. Moreover, SREA’s

members want to ensure that they can provide low cost energy resources in Alabama to reduce prices for consumers, and create economic development for the state. As a result, SREA and its individual members have substantial interests in the outcome of this proceeding and desire to intervene in order to protect those interests.

3.

SREA's rights and interests cannot be adequately represented by any other party to this docket. Specifically, SREA's expertise and interest in solar energy, wind energy, energy storage and transmission are unmatched in this docket. Its participation in this matter will not unduly delay these proceedings or prejudice any other party.

4.

SREA respectfully requests that it be granted leave to intervene and participate fully as a party in these proceedings, including the right to present testimony and exhibits, cross-examine witnesses, and file briefs. SREA intends to participate in the docket and wants to ensure that renewable energy pricing and opportunities are adequately evaluated. As part of the filing of this CCN, Alabama Power has appended its Integrated Resource Plan (IRP) as an exhibit. Substantial quantities of its filed Direct Testimony depends heavily on the IRP analysis. A number of witnesses that have filed Direct Testimony in this docket also filed in the Georgia Power Company IRP earlier this year, of which SREA was an intervening party to. SREA has participated extensively in IRP proceedings for the Arkansas Electric Cooperative Company, Big Rivers Cooperative Corporation (Kentucky), Cleco Corporation (Louisiana), Entergy Arkansas, Entergy Louisiana, Georgia Power Company, Kentucky Power, Southwestern Electric Power Company (Louisiana) and the Tennessee Valley Authority. Our expertise regarding utility-scale wind energy, energy storage, solar energy, transmission, utility resource planning, and specific

knowledge of the Georgia Power IRP, would be valuable in this proceeding. SREA's individual members would have standing to intervene in their own right; however, neither the claim asserted nor the relief requested requires the participation of individual members in this docket. Our interest in intervention is germane to the organization's purpose.

5.

SREA has established both a position and an interest in the above docket. SREA therefore possesses standing to intervene and respectfully requests the Commission's permission to intervene as a party and to submit written testimony and/or comments in these dockets, and all rights granted via intervenor status.

6.

SREA respectfully requests that the following be included on the service list in this docket and that all communications regarding this docket be directed to:

Simon Mahan

Southern Renewable Energy Association

PO Box 14858

Haltom City, TX 76117

(337) 303-3723

simon@southernwind.org

WHEREFORE, SREA respectfully requests that the Commission grant its application for leave to intervene and admit it as a full party of record in these proceedings with all right attendant thereto.

Respectfully submitted this 27th day of September , 2019



Simon Mahan
Executive Director
Southern Renewable Energy Association
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Haltom City, TX 76117
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CERTIFICATE OF SERVICE

I, Simon Mahan, hereby certify that I have on this day filed with the Alabama Public Service Commission the original of the Southern Renewable Energy Association's Motion to Intervene and that in compliance with the Alabama Public Service Commission's Rules of Practice and Procedure, I have served a copy via electronic mail or via United States Postal Service, to all parties of Docket No. 32953. I have caused an original and one (1) copies of the Motion to Intervene to be filed with:

Walter L. Thomas
Executive Secretary
Alabama Public Service Commission
100 North Union Street
P.O. Box 304260
Montgomery, AL 36130

and that I have transmitted on this day one copy of the above Motion to Intervene to:

Twinkle Andress Cavanaugh
Alabama Public Service Commission
100 North Union Street
P.O. Box 304260
Montgomery, AL 36130

Jeremy H. Oden
Alabama Public Service Commission
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Chip Beeker
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Dan H. McCrary
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Respectfully submitted this 27th day of September , 2019



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