

Document-less Motion to Intervene

Intervening in:

Alabama Power Company	Docket No. ER21-1111-000
Louisville Gas and Electric Company	Docket No. ER21-1114-000
Duke Energy Progress, LLC Duke Energy Carolinas, LLC	Docket No. ER21-1115-000
Duke Energy Carolinas, LLC	Docket No. ER21-1116-000
Duke Energy Progress, LLC	Docket No. ER21-1117-000
Louisville Gas and Electric Company	Docket No. ER21-1118-000
Georgia Power Company	Docket No. ER21-1119-000
Kentucky Utilities Company	Docket No. ER21-1120-000
Mississippi Power Company	Docket No. ER21-1121-000
Alabama Power Company	Docket No. ER21-1125-000
Dominion Energy South Carolina, Inc.	Docket No. ER21-1128-000

Energy Alabama, GASP, Sierra Club, Vote Solar, Georgia Interfaith Power and Light, Georgia Conservation Voters, South Carolina Coastal Conservation League, and Partnership for Southern Equity (together “Southeast Public Interest Groups”) move to intervene in this proceeding.

Energy Alabama is a membership-based nonprofit organization accelerating Alabama’s transition to sustainable energy. Energy Alabama accomplishes its mission by educating, informing smart energy policy, building the next generation workforce, and providing technical assistance to deploy more sustainable energy. Energy Alabama believes in sustainable energy for all.

GASP is a nonprofit organization that works to advance healthy air and environmental justice in the Greater-Birmingham area through education, advocacy, and collaboration. With over 1,484 members, GASP believes every Alabamian has the right to breathe clean, healthy air. GASP strives to reduce air pollution, educate the public on the health risks associated with poor air quality, and encourage community leaders to serve as role models for clean air and clean energy development.

The Sierra Club, founded in 1892, is a national organization with more than 60 chapters and over three million members and supporters. The Sierra Club's purpose is to explore, enjoy, and protect the wild places of the earth; to practice and promote the responsible use of the earth's ecosystems and resources; and to educate and enlist humanity to protect and restore the quality of the natural and human environments. Part of the Sierra Club's current work focuses on environmental and public health problems associated with energy generation. Sierra Club frequently advocates for wholesale market designs and rules that facilitate fair participation by renewable energy resources, demand-side management, and storage. Sierra Club advocates for rules that do not give undue preference to fossil fuel generation in a manner that increases costs to consumers without commensurate benefits.

Vote Solar is a non-profit policy advocacy organization with the mission of making solar more accessible and affordable across the United States. Vote Solar works in 25+ states to drive the transition to a just 100% clean energy future. Vote Solar is a team of solar advocates using deep policy expertise, coalition building, and public engagement to power just and equitable clean energy progress nationwide. Vote Solar has active campaigns underway in North Carolina, South Carolina, Georgia and Florida to drive clean energy progress.

Georgia Interfaith Power and Light ("GIPL") is a nonprofit organization with a mission to equip faith communities across Georgia to care for Creation and each other through worship and education, and by promoting energy efficiency and renewable energy sources. GIPL inspires and equips members to aid in environmental justice and stop poor energy choices. GIPL's work to promote renewable energy and energy efficiency is at the core of the organization's mission. Georgia Conservation Voters is a nonprofit organization that works to protect Georgia's air, water, and land through political action. Georgia Conservation Voters advocates for public policies that advance a more just and sustainable future, campaigns for candidates who make climate and environmental justice a priority, and works to hold elected officials accountable for their actions and votes.

South Carolina Coastal Conservation League ("CCL") is a nonprofit organization based in Charleston whose mission is to protect the natural environment of the South Carolina coastal plain and to enhance the quality of life in its communities by working with individuals, businesses, and government to ensure balanced solutions. CCL supports the development of energy policy that is in the public interest of South Carolinians, including distributed energy resources. CCL has long been an active participant in South Carolina Public Service Commission proceedings in support of effective rates and policies and clean distributed energy resources.

Partnership for Southern Equity ("PSE") is nonprofit committed to promoting racial equity and shared prosperity in metropolitan Atlanta and the American South through a coalition-based model for multi-demographic capacity building for equity. PSE seeks to lift up Black people, communities of color and low-wealth people by connecting marginalized populations to solutions that build power for their communities. PSE is the convener and founding member of the Just Energy Circle, a values-driven collaborative effort to promote sustainable, self-sufficient communities that encourage participation in developing clean energy solutions for everyone's benefit. PSE's Just Energy Circle aims to establish structures to ensure that energy opportunities are available to all, including low-income protections, reduced energy costs, and employment.

On February 12, 2021, in Docket No. ER21-1111-000, Alabama Power Company submitted a Southeast Energy Exchange Market Agreement for Commission acceptance under Section 205(c) of the Federal Power Act and Part 35 of the Commission's regulations. The entire proposal includes related filings by members of Southeast Energy Exchange Market Agreement to modify their Open Access Transmission Tariffs or concur with the agreement. The proposed market arrangement would impact the Southeast Public Interest Groups' advocacy and interests regarding expanding and diversifying access to affordable renewable energy and related issues affecting the electric power system the Southeast. The Southeast Public Interest Groups therefore, have a substantial interest in this proceeding, which cannot be represented adequately by any other party. The Southeast Public Interest Groups' participation in this proceeding is in the public interest.

March 15, 2021

Frank Rambo
Senior Attorney
Southern Environmental Law Center
201 West Main St., Suite 14
Charlottesville VA 22902
(434) 977-4090
frambo@selcva.org

Maia Hutt
Staff Attorney
Southern Environmental Law Center
601 West Rosemary Street, Suite 220
Chapel Hill, North Carolina 27516-2356
Phone: (919) 967-1450 ext. 161
mhutt@selcnc.org