

**BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION
STATE OF GEORGIA**

In Re:)
)
Review of Georgia Power Company's) **Dockets No. 27800 & 29849**
Certificate of Public Convenience and)
Necessity for Plant Vogtle Units 3 and 4)

NUCLEAR WATCH SOUTH REQUEST FOR EMERGENCY PUBLIC HEARING

Nuclear Watch South respectfully requests that the Georgia Public Service Commission (PSC) immediately establish a schedule for public review of Georgia Power's Vogtle 3 & 4 expansion under construction in Burke County and an emergency public hearing. The PSC is authorized to initiate inquiries and hearings pursuant to O.C.G.A. § 46-2-20 (b).¹ The PSC has the power to investigate and subpoena information from the utilities which it regulates pursuant to O.C.G.A. § 46-2-20 (f) and (g).²

To support the public hearing process, Georgia Power must be given an early deadline (June 30, 2017, or earlier) and required to submit, at minimum:

- 1) The complete and true construction schedule for Vogtle 3 & 4
- 2) The cost to complete Vogtle 3 & 4 construction
- 3) The cost to cancel Vogtle 3 & 4 construction
- 4) The cost to complete Vogtle 3 & 4 as a renewables facility

In fact, Georgia Power testified of its obligation to furnish such information at the PSC Energy Committee meeting on March 30, 2017, however, no timeframe was established nor was the

¹ O.C.G.A. § 46-2-20 (b) The commission may hear complaints; in addition, it is also authorized to perform the duties imposed upon it of its own initiative.

² O.C.G.A. § 46-2-20 (f) The commission shall also have the power and authority to examine all books, contracts, records, papers, and documents of any person subject to its supervision and to compel the production thereof. (g) The commission shall have the power, through any of its members, at its discretion, to make personal visits to the offices and places of business of the companies under its supervision for the purpose of examination. Any Commissioner making a personal visit pursuant to this subsection shall have full power and authority to examine the agents and employees of any such company, under oath or otherwise, in order to procure information deemed by the Commissioner necessary to the work of the commission or of value to the public.

public invited to speak in the discussion. Since ongoing construction at Vogtle 3 & 4 costs upwards of \$2 million per day it is urgent to undertake a binding public process soon. Nuclear Watch South proposes the deadline June 30, 2017, for Georgia Power to submit the required information.

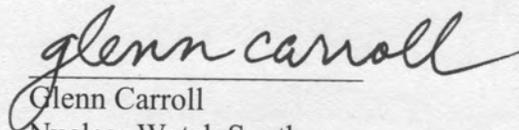
Georgia Power's entire portion of Vogtle 3 and 4 has been underwritten with public funds: \$2 billion through the Nuclear Construction Cost Recovery tariff collected from 2.3 million Georgia Power customers for the previous six (6) years in addition to \$8.3 billion loaned from the U.S. treasury at 0% interest. Georgia Power's customers have been forced to invest an average of \$500.00 *each* into Vogtle 3 & 4 construction through 2016.

Georgia Power's Vogtle 3 & 4 construction consortium partners, Westinghouse and Stone and Webster/CB&I, are now bankrupt. Georgia Power has benefited financially, however, posting a 20% profit increase during the Vogtle construction years. Georgia Power's annual report performance data show clearly that electricity sales have gone down by 1% since Vogtle was certified in 2008, despite Georgia's population surge of 1,200,000 people in the same time frame. Georgia Power's unused capacity remains at twice the national average and at almost five times the 7% recommended emergency reserve needed. Simply put, Vogtle 3 & 4 are not needed.

Nuclear Watch South submitted testimony that power from Vogtle 3 & 4 is not needed in the 8th, 12th, 13th and 14th Vogtle Construction Monitoring reviews. Neither Georgia Power or the Public Interest Advocacy staff have refuted the Georgia Power performance data providing the basis for Nuclear Watch South's finding. It has been almost four years since this data has been in the record and Georgia Power's performance trends, i.e. slack sales and excess capacity, have deepened. Georgia Power's performance trends are mirrored in other U.S. markets, affecting its wholesale prospects as well.

Georgia Power is legally guaranteed to recover the cost of Vogtle 3 & 4 in rates charged to its customers. The PSC must move swiftly to protect the Georgia public from further financial harm. The construction schedule which has been kept out of the public eye throughout the project must be brought to light and subjected to scrutiny including an emergency public hearing.

Respectfully submitted,


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