



**NUCLEAR WATCH  
SOUTH**

P.O. BOX 8574

ATLANTA, GA 31106

404-378-4263

info@nonukesyall.org

[www.nonukesyall.org](http://www.nonukesyall.org)

December 8, 2015

Chairman Chuck Eaton and Commissioners  
Georgia Public Service Commission  
244 Washington Street, N.W.  
Atlanta, GA 30334

Re: Motion to Strike Testimony, Docket No. 29849

Dear Chairman Eaton and Commissioners:

Nuclear Watch South (NWS) respectfully responds to Georgia Power Company's "Motion to Strike Testimony" filed on December 7, 2015. In it the Company seeks to restrict the Commission's power and limit the scope of the Semi-Annual Vogtle Construction Monitoring Review (VCMR). Georgia Power argues that NWS does not address, "Whether the Commission should verify and approve or disapprove the expenditures as made pursuant to the certificate issued by the Commission." The NWS testimony directly addresses this issue by strongly arguing against approval expenditures for unneeded power supply. While Georgia Power Company may disagree with NWS's position, the Commission should not stifle legitimate public debate in a public forum before elected public officials regarding a significant public issue.

The Public Service Commission's broad discretion to consider testimony and evidence in a contested public docket is broader than a regular court. This is the 13th VCMR which the Commission has heard and for which the Commissioners have independently determined what evidence is relevant to the issues being considered. Georgia Power's attorneys have ample opportunity to cross-examine me and to file rebuttal to the positions advocated by Nuclear Watch South.

Georgia Power's motion relies solely on O.C.G.A. §46-3A-7(b) which governs the semi-annual construction review process, however, this law serves the broader statute, O.C.G.A. §46-3A-6, which grants the Public Service Commission extensive and broad powers in the regulation of public utilities.

Billions of dollars are at stake for the Vogtle project which both Georgia Power and the Commission Staff acknowledge is currently 39 months behind schedule and exceeds the original certified cost. Nuclear Watch South's has refrained from expressing any value judgments on the nuclear project throughout the proceeding, proffering valid arguments on matters which this Commission regulates and which should be considered on their merits by this Commission. Nuclear Watch South asks the Commission to deny the Company's motion and allow it to present its arguments in an open public forum.

Respectfully submitted,

Glenn Carroll  
Coordinator

Cc: Mr. Reece McAlister