Tariff Proposal to Curb Load Growth from Data Centers with Expanded Residential Energy Efficiency, Demand Response, and Distributed Energy Generation Programs in Georgia

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ABSTRACT

Across the Southeastern U.S., utilities are proposing more steel-in-the-ground generation projects to meet rising demand forecasts, with data center growth specifically highlighted as a primary driver. In the Southeast, the financial risk of overbuilding often passes to ratepayers while utilities are guaranteed cost recovery. Utilities are generally incentivized to overbuild even when such investments conflict with the financial interests of their customers. Ratepayers are likely to benefit financially from reductions in utility capacity growth. It is therefore in the public interest to explore opportunities to curb the growth of new capacity through energy efficiency (EE), demand response (DR), and distributed energy resource (DER) programming. These clean energy resources are already regulated to ensure grid reliability and can reduce household energy burdens when funded by third parties.

In 2024, Duke Energy Carolinas signed agreements with Amazon, Google, and Microsoft to develop new rate structures, or tariffs, that will facilitate load flexibility and investment in clean energy assets. We examined the potential to meet capacity needs by expanding EE, DR, and DER programs on the Georgia Power system, funded by "clean energy" tariffs for large-load customers. With tariff funding, such programs can realize a far greater share of these resource potentials. Our work outlines potential new rate structures, based on existing utility tariffs, that would confine the cost of these programs to participating large-load customers and facilitate benefits for residential customers. Our findings show the potential for 2.5 GW of additional capacity in year one, rising to 9.6 GW by year ten.

TARIFF CONTEXT

A recent review of tariffs designed to offset large loads identifies common practices used by utilities across the United States (Satchwell 2025). Key tariff design elements identified in this review include:

1. Eligibility terms
2. Contracted capacity
3. Duration of contract
4. Energy source

Eligibility may be determined through a minimum load requirement, specification of customer type, or credit rating/collateral requirement. Utilities may require customers to purchase a given amount of capacity (MW) or energy (kWh) and define terms under which they can alter these amounts. Contracts may also specify a duration time, ramp time, and exit fee. Some tariffs also include provisions for marginal pricing to limit cross-subsidization.

Nevada Energy's Clean Transition Tariff (CTT), approved by Nevada's Public Utilities Commission in May of 2025, allows the utility to contract with a new clean energy resource and pass the costs of the contract along to a specific customer with a minimum monthly load of 5 MW (Jenkins 2026). The CTT enables a large-load customer, such as Google, which partnered with the utility on this tariff, to pay the difference between the cost of new clean energy and the least-cost generation mix (Wu 2024). Fervo Energy's 115 MW Corsac geothermal station will provide clean energy at a predetermined rate through NV Energy's grid, and Google assumes the financial liability for the project. This tariff provides a replicable model under which other clean energy resources, such as DSM programming, could be financed by large-load commercial customers (Linvill 2024).

Other utilities have been exploring and, in at least one case, adopting their own CTT structures. Xcel Energy has partnered with Google on a variation of the CTT to finance solar, wind, and batteries to offset load growth from data centers in Pine Island, Minnesota (Jenkins 2026). Google is also financing a distributed capacity procurement program that will pay local businesses on Xcel's grid to host utility-owned and operated battery storage assets. This program was advanced in conjunction with the Pine Island project as an alternative deployment model that may be adopted more widely pending a comprehensive, third-party evaluation required by Minnesota's PUC. Xcel's distributed capacity program may influence utilities in other states that are developing their own CTTs.

In 2024, Duke Energy announced it was partnering with large-load customers to develop what it calls Accelerating Clean Energy (ACE) Tariffs in the Carolinas (Sharpe 2025). According to the utility, its ACEs framework will include a CTT to be approved by both state commissions.

Rate Construct Recommendations: The Case of Georgia Power

The Georgia Public Service Commission (PSC) requires Georgia Power to model least-cost demand side management solutions, implement energy efficiency targets, and provide demand response programs as part of its triennial Integrated Resource Planning process (SEEA 2019). There are no statewide demand side management targets in Georgia, but the utility must defend its own targets in regulatory proceedings before the PSC. Demand side management can reduce the utility's demand forecasts which in turn reduces the need for investment in additional generation capacity.

In 2025, the Georgia PSC approved Georgia Power's request to build 10 gigawatts of new gas fired power plants at an estimated lifetime cost to ratepayers of $50 Billion (SELC 2025). The utility's request was based on its projections for demand growth from data centers. If the utility were to fund an expansion of its DSM programming through a CTT, it would not have to charge ratepayers for new capacity buildouts.

Georgia Power could use a CTT to expand its energy efficiency, demand response, and distributed energy resource programming for residential customers. To ensure that such a tariff is efficient and practical, it is preferable to expand upon existing utility programming in these areas. The following sections identify existing utility programs that are ripe for expansion

through a CTT. Georgia Power's CTT could help to relieve the state's energy burden by prioritizing low-income customers as the first beneficiaries of these program expansions.

Energy Assistance for Savings and Efficiency (EASE) Program Expansion

This Georgia Power program provides no-cost home energy-efficiency improvements for customers whose household income is at or below 200% of the U.S. Federal Poverty Guidelines (Georgia Power 2026). EASE improvements include common weatherization and EE measures such as air and duct sealing, attic insulation, HVAC service, smart thermostats, and LED lighting. Such a program could be expanded through a clean energy tariff to include the replacement of standard efficiency appliances with high-efficiency models. Heating and cooling systems could likewise be replaced with more energy-efficient heat pumps to achieve greater overall energy savings. With funding from a CTT, these upgrades could be financed for a majority of Georgia Power's residential customers through a tiered system that prioritizes low-income ratepayers. Residential energy savings from an expansion of the EASE program would accrue over time.

A particularly powerful program design for increasing the efficacy and impact of these efforts is the Retrofit Navigator. In this structure, residents and building owners are guided through an accelerated process that improves efficiency, comfort, and affordability, shaped by community co-creation. Multiple funding streams are stacked and braided to fund project scopes, create economic development, and support neighborhood stabilization. Retrofit Navigator programs are a leading-edge path to successful residential retrofit activity across the nation, with deployments in Denver, Philadelphia, Madison, WI, and New York City (C40 2024). While a full detailing of Retrofit Navigator concepts and designs is beyond the scope of this paper, interested readers should consult the Community Retrofit Collaborative's resources on this topic (CRC 2026).

A tariff rate for large load customers could be used to finance the program's expansion to a Retrofit Navigator structure. The related energy savings could be aggregated in a dedicated portfolio so that all large load customers would pay the same tariff rate. This tariff could have a structure similar to Georgia Power's Commercial & Industrial REDI Schedule (CIR-1), which enables these customers to purchase a subscription in exchange for hourly credits based on their pro rata share of a portfolio of generation from additional renewable facilities (Georgia Power 2020). Additional capacity created by weatherization measures and energy-efficiency upgrades would play a role similar to that of generation from renewable energy sources under CTTs in other states.

As with the CIR-1 schedule, large load customers could pay a fixed cost similar to Georgia Power's CIR Portfolio Price, and in return receive an hourly credit that would function like an energy-efficiency certificate or "white tag". Georgia's Public Service Commission has ruled that Georgia Power must retire all renewable energy credits, or similar certificates, on its customers' behalf. The utility could contract with large load customers to share profits from the sale of surplus credits and thereby provide these customers with a return on their investment. A limit on share size could be established based on the program's capacity-creation potential.

Portfolio prices could be based on the installed cost of weatherization measures and the incremental cost of new appliances or equipment levelized over the agreed-upon tariff term. The incremental cost of energy-efficient appliances and heat pumps is available in Georgia Power's Technical Reference Manual, published as part of the utility's 2019 Integrated Resource Plan (IRP) with updates in subsequent IRP cycles (Nextant 2019). This cost represents the difference between the energy-efficient model and what the customer might otherwise purchase. Program administration and community engagement costs could be financed through a separate rider like Georgia Power's Demand Side Management Residential Schedule (DSM-R-15), applicable only to tariff participants (Georgia Power 2025a). Such an approach would "ring-fence" all program costs.

Georgia Power already procures independent evaluation, measurement, and verification (EM&V) services for its demand side management (DSM) portfolio and could do the same to validate savings from an expansion of the EASE program. This audit would provide tariff participants with independent verification of the new capacity and energy savings enabled through their payments. If the EASE program were expanded to a Retrofit Navigator structure and kept as a certified DSM program, many of these program features would simply require retaining the existing processes approved by the Georgia Public Service Commission.

A tariff that invests in and quantifies energy-efficiency savings may be attractive to customers seeking to make environmental claims about their energy use. Funds from tariff payments would finance efficiency measures that would result in energy savings for residential customers and clean energy credits for tariff participants. Meter-level estimates of these energy savings, which are required by law as part of the EMV process, would give tariff participants the legal standing to claim their environmental attributes. Certificates would be retired by the utility on behalf of tariff participants, as they do with existing renewable energy certificate programs.

Georgia Power commissioned an updated energy efficiency technical, economic, and achievable potentials (TEAPot) study as part of its 2025 Integrated Resource Plan (AEG 2025). With funding from a dedicated clean energy tariff, the utility's energy-efficiency programming could be expanded beyond its achievable potential. This portion would depend on the specific level of tariff funding, and therefore its attractiveness to participants. The utility can meet its achievable potential without tariff funding. To calculate additional energy efficiency potential, it is therefore necessary to subtract Georgia Power's achievable potential from its economic potential. It is also realistic to assume that only 80% of this additional potential will be realized due to various constraints on program participation. These calculations result in an additional economic energy efficiency potential of 6,152,800 MWh through 2035, with a concomitant 1,191 MW of cumulative peak-demand reductions.

Demand Response

Georgia Power could also offer a clean energy tariff by expanding its demand response programming. With enabling technologies, which can range from a smart thermostat to a smart electrical panel, Georgia Power can automate demand response program participation to achieve greater peak demand savings (PG&E 2026). A clean energy tariff could be structured so that tariff participants fund the installed cost of enabling technology and receive credit for all peak-

demand reductions and energy savings they facilitate. As part of a Retrofit Navigator expansion of the EASE program, a clean energy tariff could be structured to fund a version of the CIR Portfolio based on peak demand reductions from expanded DR programming. Program administration, EM&V, and community engagement could again be financed through a version of the DSM-R schedule applied only to tariff participants and Georgia Power could share revenue from the sale of surplus clean energy certificates with those participants.

A pilot program would be essential to demonstrate that real-world energy savings could be achieved through the deployment of a novel technology, but proven options like smart thermostats could be deployed at scale without delay. Households with incomes at or below 200% of the U.S. Federal Poverty Guidelines would be prioritized in this design, along with all new-build affordable housing. The program could then be extended to as many households as possible to realize Georgia Power's full demand response potential.

Georgia Power's 2025 Integrated Resource Plan projects the utility's residential winter peak demand through the year 2047 (Georgia Power 2025b). The Brattle Group has estimated that with enabling technology and peak pricing, demand response programming for residential customers can reduce peak demand by approximately 25 percent (Faruqui 2012). Based on these assumptions, Georgia Power's annual peak demand reduction potential for the residential and small commercial market segment is estimated to be 1,671 MW in 2027 rising to 2,145 MW ten years later in 2036.

Distributed Solar and Storage

Rooftop solar systems may be installed, owned, and operated by Georgia Power on residential buildings with funding from clean energy tariffs in a variation on the utility's DER Colocation Program (Georgia Power 2024). As with the Retrofit Navigator EASE expansion, tariff participants would pay for the installation and operation of these systems through a levelized CIR-like portfolio. Program administration, EM&V, and community engagement for multifamily buildings could be financed through a rider mechanism, similar to the utility's Demand Side Management Commercial Schedule (DSM-C), applicable only to tariff participants (Georgia Power 2025c). A tailored version of the DSM-R schedule that restricts program costs to tariff participants would replace the DSM-C for single-family homes.

Tariff participants may or may not be able to financially benefit from RECs generated by on-site systems; the rules vary by tariff, with the utility taking ownership and retiring RECs on behalf of the customer in many cases. However, a revenue-sharing mechanism could be created between the utility and its tariff participants for this purpose. Georgia Power may wish to partner with a third-party aggregator on all or some of these responsibilities. Such a tariff could prioritize the same low- and moderate-income customers identified in the Retrofit Navigator EASE program expansion proposal and widen its scope over time to include as many homes as possible.

Calculations based on data from Google's Project Sunroof platform reveal that Georgia Power's grid has the potential for approximately 12,600 MW of residential rooftop solar capacity (Google 2026). This figure assumes that residential buildings on Georgia Power's system account for approximately 23% of the state's total rooftop solar resource and that no more than 50% of these

households would participate in a tariff funded program. Using the National Laboratory of the Rockies' PV Watts tool, we estimate that Georgia's residential rooftop solar capacity potential would generate roughly 16,000,000 MWh of electricity per year (US DOE 2026).

The capacity potential for this resource must be adjusted by the utility's approved effective load-carrying capacity value (ELCC) for battery storage. ELCC is the percentage of a resource deemed "firm" power. Based on projections in Georgia Power's 2025 IRP, the ELCC for battery storage will decline from 68% to in 2027 to 50% in 2035. In 2035, our forecast therefore places the ELCC-adjusted residential rooftop solar capacity at 6,310 MW.

IMPLEMENTATION

Clean energy resource potentials can be realized on a tiered schedule that prioritizes low-income residential customers. The EASE program already targets this demographic. Georgia Power can collaborate with cities and communities to achieve this end. Best practices will ensure that the utility prioritizes underserved customers.

Linear Growth

We assume that capturing the full identified resource potential in a single year is not feasible for any number of reasons, such as funding and workforce availability. Year-to-year tariff funding would determine the level of energy efficiency, demand response, and rooftop solar that could be achieved each year. Even with sufficient funding, it would still take time to properly implement the program and complete installations. Due to these constraints, a realistic forecast will assume a phased-in realization of clean energy resource potentials. Figure 1 shows the annual potential for each resource, and for all three resources combined, if they were to reach their full capacities over a decade of linear growth.

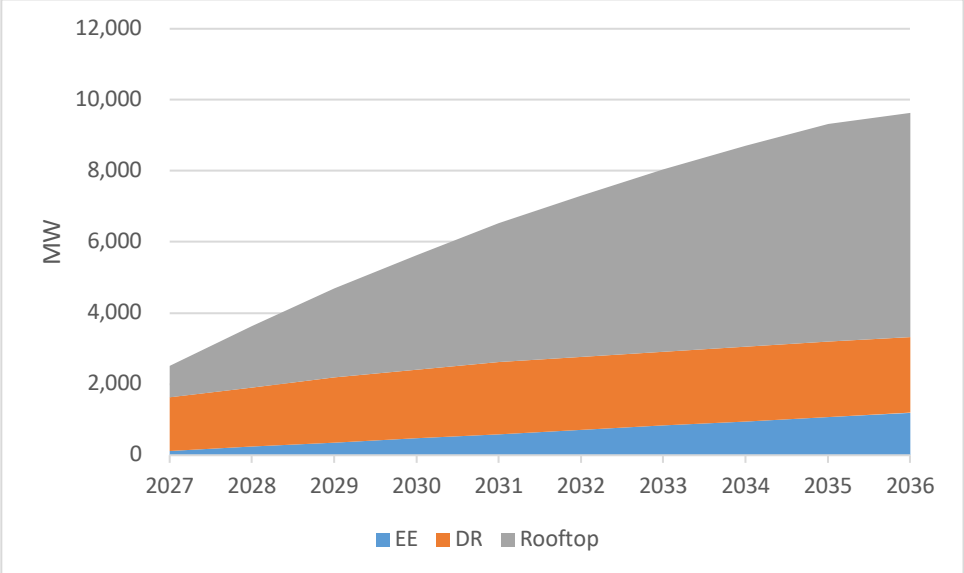

Figure 1: Clean energy potentials over time assuming a decade of linear growth to total capacities (MW).

Share of Peak Demand

When combined, these clean energy resources can meet a significant percentage of Georgia Power's projected peak demand. Despite projected growth in the utility's peak demand, these clean energy resources constitute an increasing share of that demand, rising from 12% in 2027 to 37% by 2036. Figure 2 shows clean energy resource potentials as a share of Georgia Power's projected winter peak demand forecast.

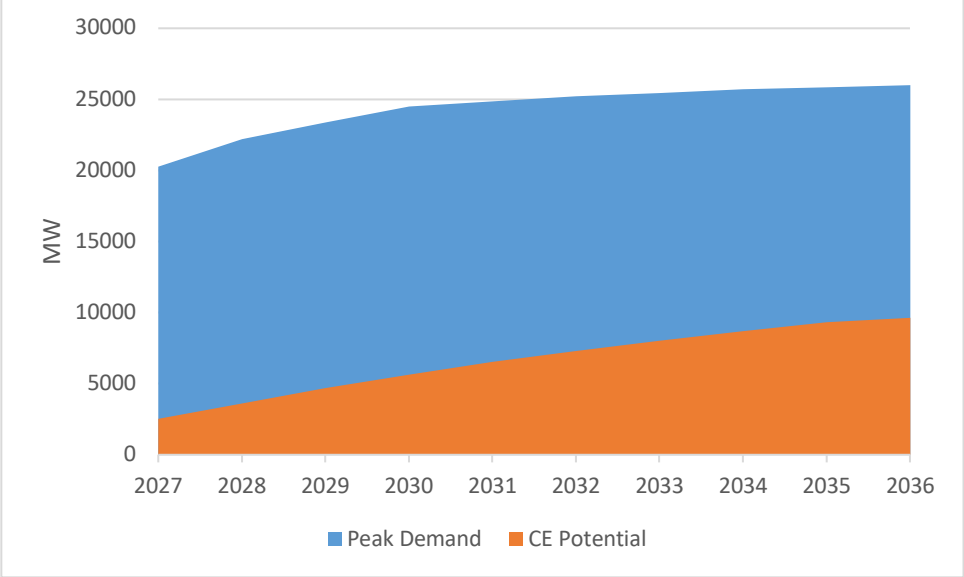

Figure 2: Total clean energy potential as a share of Georgia Power's projected winter peak demand (MW).

Risk Containment

All three of our tariff proposals assign responsibility for program risk to the large load customers whose rates would fund them. This approach mirrors the design of the aforementioned CTTs in both Nevada and Minnesota. Georgia Power would estimate the capacity available from these clean energy resources as part of its CTT offering. Utility resource capacity estimates are highly conservative and regulated by state public service commissions (PSCs) to ensure system reliability. Georgia Power regularly calculates the impacts of its various demand side management programs on peak demand as these calculations affect utility load forecasts which must be approved by the PSC. The impact of rooftop solar and battery storage on Georgia Power's load forecast would be discounted in regulatory proceedings by the utility's ELCC for battery storage. Such regulation minimizes the risk of program underperformance both to large load customers and to the grid as a whole.

ENGAGEMENT STRATEGY

Greenlink Analytics' Process Guide for City-Community Collaboration provides guidance to city staff on designing and implementing inclusive processes for the shared analysis of equity data

(Gonzalez 2021). This guide was developed by a national team of practitioners with deep backgrounds in city government, community organizing, participatory action research, energy policy facilitation, and climate justice action. Georgia Power could use this guidance to collaborate with community partners to develop an engagement strategy that ensures equitable access to energy-efficiency opportunities funded by these tariff programs. Many resources from the Community Retrofit Collaborative continue to build on this foundation.

The American Council for an Energy-Efficient Economy (ACEEE) has conducted several recent studies on best practices to ensure equitable access to energy-efficiency programs. One of these studies finds that low- and moderate-income renters and households identifying as Black, Latino/a, Indigenous, rural, or non-English speakers are underserved by utility energy efficiency programs relative to other households (Amann 2023). These demographics have lower rates of participation in available incentive programs and less access to the incentivized technologies. To better reach underserved customers, ACEEE has also published a toolkit which contains several relevant recommendations (Mah 2023).

TVA's Home Uplift program embodies many of the best practices for equitable access to energy efficiency opportunities recommended by ACEEE (TVA 2026). Available throughout the Authority's multi-state service, this program provides an average of $10,000 worth of home energy upgrades to income eligible customers. Upgrades include weatherization, HVAC, electric water heaters and energy efficient appliances. Home energy use is reduced by 25%, and participants save an average of $500 per year. Home Performance with Energy Star is a partner on the program and provides all participants with energy audits. The program's cap of $10,000 in upgrades per home should be sufficient for tariff funded measures, but overall funding under a tariff program would be significantly higher than what is available on an annual basis from TVA.

Home Uplift's community engagement strategy embodies many of the best practices recommended by ACEEE. It embodies the one-stop shop approach to energy efficiency programming in so far as energy audits go beyond simple weatherization measures to recommend additional appliance upgrades and the replacement of HVAC systems with heat pumps. This program is also administered in partnership with local power companies (LPCs), all of which are either municipal utilities or cooperatives. These LPCs have close ties with community organizations in their service territories, employ local energy efficiency professionals, and frequently sponsor local workforce development. The Electric Power Board (EPB) of Chattanooga, which is a subsidiary of the city government, employs an in-house team of energy efficiency professionals who administer the utility's Home Uplift program (EPB 2026). Georgia Power could likewise partner with local municipalities to draw on their established ties with community organizations.

CONCLUSION

Multiple utilities throughout the U.S. have developed Clean Transition Tariffs for large load customers to mitigate the impact of data centers on both their grids and the environment. A move towards CTTs that are based on distributed clean energy resources is already underway in Minnesota. The state of Georgia has become a magnet for new data centers and would benefit from a similar tariff based on residential energy efficiency, demand response, and rooftop solar

paired with battery storage. These resources have the potential to reduce Georgia Power's load forecast by 12-37% over the coming decade. Existing Georgia Power programs could be expanded with tariff funding and accessed by residential customers through a retrofit navigator approach that prioritizes low-income customers and community engagement. Large load customers would assume all program risk under such a tariff, and capacity estimates would be regulated by the Georgia PSC to minimize any risk to overall grid reliability. This proposal would lead to a win-win-win scenario in which large load customers generate local support for their projects, residents save money on their utility bills, and Georgia Power is able to meet rapid demand growth with reliable clean energy resources.

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