PEOPLE'S POWER UNION

POLICY WHITE PAPER

Who Gets the Savings?

Georgia's local governments pay Georgia Power about $75 million a year to rent their street lights. LEDs cost less to maintain. Utilities in Indiana and Connecticut have filed how much less. At their figures, Georgia's local governments could be saving $10.0 million to $13.7 million a year. No filing in Georgia Power's 2022 rate case shows whether any of that money reached them.

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Terms used in this paper

- *Energy charge*: what a local government pays for the electricity a light burns, under a schedule called EOL-16.
- *Fixture fee*: the flat monthly rent a local government pays for the light itself, maintenance included. There is no separate maintenance charge on the bill.
- *Bill*: what a local government actually receives each month. It is a total, and it does not list the lights the total covers.
- *Return*: the profit a utility is allowed to earn on the money it has invested, stated as a percentage of that investment.
- *Depreciation*: the share of a light's purchase cost the company recovers in each year of the light's working life.
- *Tariff*: the published price list a utility has to charge, approved by the Commission. A schedule is one page of that price list. Street lights sit on two of them, a fixture schedule and an energy schedule.
- *File*: to hand a document or a number to the Commission as part of an official case. A filed number is on the public record, and anyone can check it and hold the company to it.
- *Rate case*: the proceeding where a utility asks to change its prices and files the evidence behind the request.
- *Cost-of-service study*: the spreadsheet a utility files in a rate case that splits its spending, investment and revenue across groups of customers, so the Commission can see what each group costs to serve and what it pays.
- *Base rates*: the core prices set in a rate case, before riders.
- *Riders*: extra charges added on top of a rate for a specific cost, such as fuel or storm recovery.
- *Vogtle charge*: the Nuclear Construction Cost Recovery charge for the new units at the Vogtle nuclear plant. Until May 2024 it was billed as a percentage on top of the fixture fee. It then ended, and the cost moved into base rates.
- *Input wattage*: the wattage the tariff assigns to a light for billing. It includes the power drawn by the ballast, so it is higher than the number printed on the lamp.
- *Lumens*: a measure of how much light comes out. The current fixture schedule sorts LEDs by lumens instead of watts.
- *High-pressure sodium*: the orange-toned technology the LEDs replaced.

1. Executive Summary

LED street lights are one of the clearest public-sector savings stories of the last fifteen years. Los Angeles, which owns its lights, replaced more than 170,000 of them, and by the Department of Energy's count it saves about $9 million a year in energy.[1] New York City and Chicago projected savings on the same scale.[2,3]

Georgia went a different way. Many Georgia local governments do not own their street lights. They rent them from Georgia Power, which began replacing roughly 400,000 government-leased roadway lights with LEDs around 2014.[4] The rent comes in two parts: an energy charge for the electricity and a flat monthly fixture fee that covers the light, Georgia Power's return on it and the maintenance. The bill never separates those three pieces.

In a 2015 announcement and to the *Atlanta Journal-Constitution*, Georgia Power presented the conversion as better light at about the same price. A company director said the savings would "offset the installation cost," and the Commission's spokesman said the company was "not making any money right away" on the new lights and might not for "two or three years."[4,5] On those terms, the savings went to the installation cost for the first few years. This paper asks what happened after that.

What this paper found:

- The fixture fee went up, not down. After the Vogtle charge, the monthly fee for a standard roadway LED rose 32.5% between January 2022 and January 2025, about $46 a year more for each light. That nuclear charge was billed on top of the fee until May 2024 and then folded into it. As billed, the fee went from $11.46 to $15.76, a rise of 37.5%. The Commission approved each schedule.[6,7]
- The money involved is real. Utilities in Indiana and Connecticut have filed what an LED saves in maintenance: $34.36 and $25.08 a light a year.[8,9] If every leased light is now an LED, those rates put Georgia's saving at $10.0 million to $13.7 million a year, or 13% to 18% of what local governments pay in fixture fees. Counted from 2014 to the 2028 rate case, it could reach $140 million to $192 million, though that is an estimated ceiling rather than an amount.
- Georgia Power forecast its street-light maintenance 66% above 2021. However, LEDs went in to cut service visits, which should have reduced maintenance costs. Georgia Power's filed street-light maintenance for local governments rose from about $6.4 million to about $10.6 million between the two periods its 2022 cost-of-service study covers, and no filing in that rate case explains why.[10]
- The company was already earning above its average on these customers. In 2021, the last full year of actual results in that study, the local-government lighting rate earned Georgia Power a 9.95% return, against 8.37% for the company as a whole. Outdoor lighting as a group still earned above average on the company's projections for the following year. Georgia Power then proposed rates that would raise outdoor-lighting bills 12.3%, riders included, the most of its eight rate groups.[10,11]

- Local governments cannot fully check their own bills. Atlanta's auditors concluded it was "impossible to confirm that billing is accurate."[12] Augusta-Richmond County's street-light budget is 68% higher than in 2016, and no county budget document says why.[13] When Alpharetta converted, Georgia Power's own comparison projected a saving of about $81,000 a year, and almost all of the savings came from about 1,086 of the city's largest lights.[14]
- Georgia Power files what street lighting costs the company in total. No filing in its 2022 rate case gives the four numbers a local government would need to check its bill:[15]
    - how many lights of each type it pays for;
    - the wattage each is billed at;
    - what each type cost to buy and is still worth on the books;
    - what each type costs to maintain.

  Without these four data points, a local government cannot check whether its fee matches its cost.

The Commission has the legal authority to require these numbers. In July 2025, on a different question, it adopted a stipulation requiring Georgia Power to file extra cost detail.[16,17] Base rates are frozen through 2028, apart from storm costs, and Georgia Power must file its next rate case by 1 July 2028.[18] Parties to the 2028 case can ask Georgia Power for information, but if the Commission does not order the numbers now, Georgia Power may not be able to rebuild them reliably in 2028.

The Commission can require the four numbers, test the fixture fee against today's costs, write into the tariff how local governments receive a confirmed saving, and require the same disclosure whenever costs change. Local governments can build their own record before 2028. Section 6 lists the questions both can put to Georgia Power.

Where these numbers come from

This paper uses two types of number. The first is a filed number: a utility filed it with a regulator, or a government published it, and the notes cite the document. The second is this paper's own calculation, worked out from those documents, and the paper labels each one as a calculation.

Where the paper says something is not on the record, it means Georgia Power's 2022 rate case, its current and previous outdoor-lighting tariffs, the depreciation study filed with that case, and the local-government records cited here.

2. Background

LED street lights cut costs for the cities that own them

The LED street light is a product of the last fifteen years. Traffic signals came first. Cities and state transportation departments began replacing incandescent signals with LEDs in the 1990s. In 2000 the U.S. Environmental Protection Agency estimated that finishing the job nationwide would save taxpayers about

$225 million a year, and Philadelphia's 1997 retrofit of its red signals was estimated to save about $576,000 a year in power.[19] A federal efficiency standard for traffic signals followed in 2005.

Street lights followed around 2010, once LED fixtures became bright and cheap enough for roadways. The U.S. Department of Energy set up a consortium that year to help cities judge and specify them. By 2018, the Department estimated, LEDs made up nearly half (48.6%) of the country's street and roadway lights, up from 28% two years earlier.[20]

The cities that own their lights kept the savings:

- Los Angeles replaced more than 170,000 street lights with LEDs and cut their energy use by 64%. By the Department of Energy's 2017 count it saves about $9 million a year in energy, on a program budgeted at $57 million and planned to repay itself in about seven years.[1]
- New York City projected $6 million a year in energy savings and $8 million a year in maintenance savings from converting all 250,000 of its lights.[2]
- Chicago expected its program, with 210,000 of 270,000 lights converted by 2020, to cut about $10 million a year from its street-light energy bill.[3]
- Seattle's city-owned utility estimated $2.4 million a year in energy and maintenance savings from more than 40,000 residential lights.[21]

Each of the four owns its lights or its utility. Street lighting can make up a quarter to half of a city's electric bill, so savings on this scale matter to a local budget.[20]

Where a utility owns the lights, the savings are harder to pass on

Lawrence Berkeley National Laboratory found in 2017 that the main regulatory barriers to municipal LED savings were utilities with no LED rate at all, LED rates no lower than the old ones, and problems of ownership. It noted that Georgia Power's LED rate, offered at municipal customers' request, was "no lower, and perhaps slightly higher, than for conventional lighting."[22]

Maryland's energy office put it plainly in 2020: "No one disputes that LED technologies will yield savings. The challenge comes instead with assigning the savings between the regulated electric utility and its municipal customer."[23] That is the question this paper asks about Georgia.

A street light is billed twice, and only the energy charge tracks the power it uses

A Georgia local government that leases its lights from Georgia Power does not own them. Georgia Power buys the lights, installs them, maintains them, and bills for them at prices the Commission approves. The bill comes in two parts.

- The energy charge pays for electricity. Georgia Power does not meter street lights. It multiplies the wattage the tariff assigns to each light by 360 hours a month and the energy rate. A 250-watt sodium lamp gets billed at 306 watts, because the ballast draws power too.[24]

- The fixture fee is a flat monthly rent for each light. That fee covers three things: the light itself, the company's return on what it spent to buy the light, and the maintenance it does on it. No line on the bill separates them, and everything in this paper follows from that.

Replacing sodium lamps with LEDs cuts both costs. The LED burns less electricity than the sodium light it replaced, and it needs fewer bulb changes and fewer service visits.[25] Those two savings travel back to the customer by different routes. The energy charge should fall on its own once a converted light is billed at its lower LED wattage. The maintenance saving sits inside the fixture fee. The tariff sets that fee as a flat monthly amount, and no meter reads it. Nothing in the billing system moves it. Only the Commission can, by changing the fee.

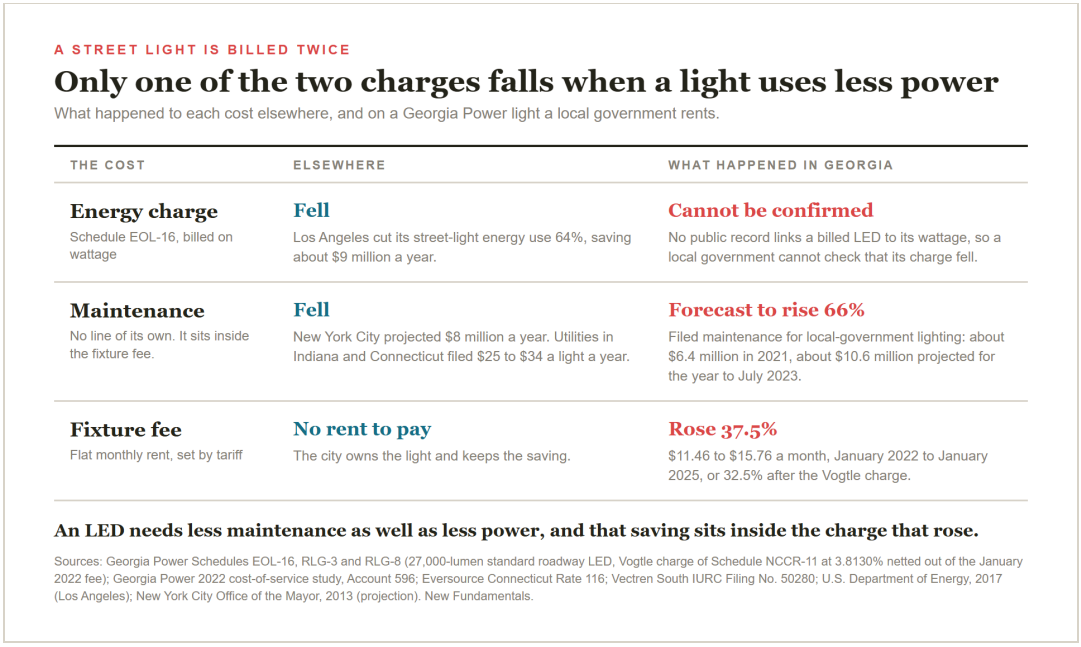


Figure 1. The two charges on a street-light bill, elsewhere and in Georgia.

Georgia Power sold the conversion as better light at about the old price

The Commission approved Georgia Power's LED rate in late 2014.[5] A year later the company's director of products and services said LED lighting "offers long-term energy savings for our customers that offset the installation cost."[4] A company spokesman told the *Atlanta Journal-Constitution* in 2016 that the new tariff "offsets" a city's electricity saving, leaving the total about where it started.[5]

The arrangement was a trade. Georgia Power paid for the new lights and the conversion, and the fee recovered that cost. The Commission's own spokesman told the newspaper the company was "not making any money right away" and might not for "two or three years." The tariff was set up so Georgia Power would recover its "stranded costs," such as still-usable old fixtures and bulbs, along with its investment in the new lights.[5]

Local governments knew as much at the start. Columbus told its council in 2015 that it "will not receive a reduction in energy cost."[26] Decatur converted 1,379 lights in 2016 for environmental reasons and saw its annual bill rise about $1,000.[27]

Georgia Power never promised local governments a refund. But a bargain built on recovering an installation cost has an end point. Once the installation cost is recovered, the savings keep coming, and the rate should start to reflect the lower cost of serving an LED. Georgia Power's tariff does not say what happens at that point, and no filing in the 2022 rate case shows whether the company has finished recovering what it spent on the conversion.

3. The Problem

The fixture fee rose 32.5% between 2022 and 2025, after the Vogtle charge

If the savings paid for the lights, the fixture fee should have leveled off or started to fall as the early conversions were paid down. It rose instead. The Commission approved increases to all four roadway LED sizes, one schedule at a time. The standard 27,000-lumen fee went from $11.46 a month in January 2022 to $12.75 in August 2023, $13.44 in January 2024 and $15.76 in January 2025. That is 37.5% as billed, and every roadway LED size rose by almost exactly the same share.[6]

Some of that rise is not new money. Until May 2024 Georgia Power billed the Vogtle nuclear charge as a separate line on top of the fee, at 3.8130% in January 2022. When that charge ended, the same cost moved into base rates, and so into the fee itself.[7] Add the Vogtle charge to the 2022 fee and the starting price is $11.90, by this paper's calculation. The rise to $15.76 is then 32.5%, or about $46 a year for each light. Consumer prices rose 13.0% over the same three years, so the fee rose about two and a half times as fast as inflation.[28] A June 2026 change added another 1.7% to recover storm costs. Georgia Power applied it across all its rates, so it says nothing about street lighting.[29]

For a local government with 10,000 standard roadway LEDs, the rise since January 2022 after the Vogtle charge comes to about $464,000 a year. Across the statewide fleet of roughly 400,000 lights it would be about $18.5 million a year if every light were a standard roadway LED. Both are this paper's calculations. The statewide one overstates the total, because many lights sit on smaller, cheaper tiers, and Georgia Power has not filed how many lights sit on each tier.

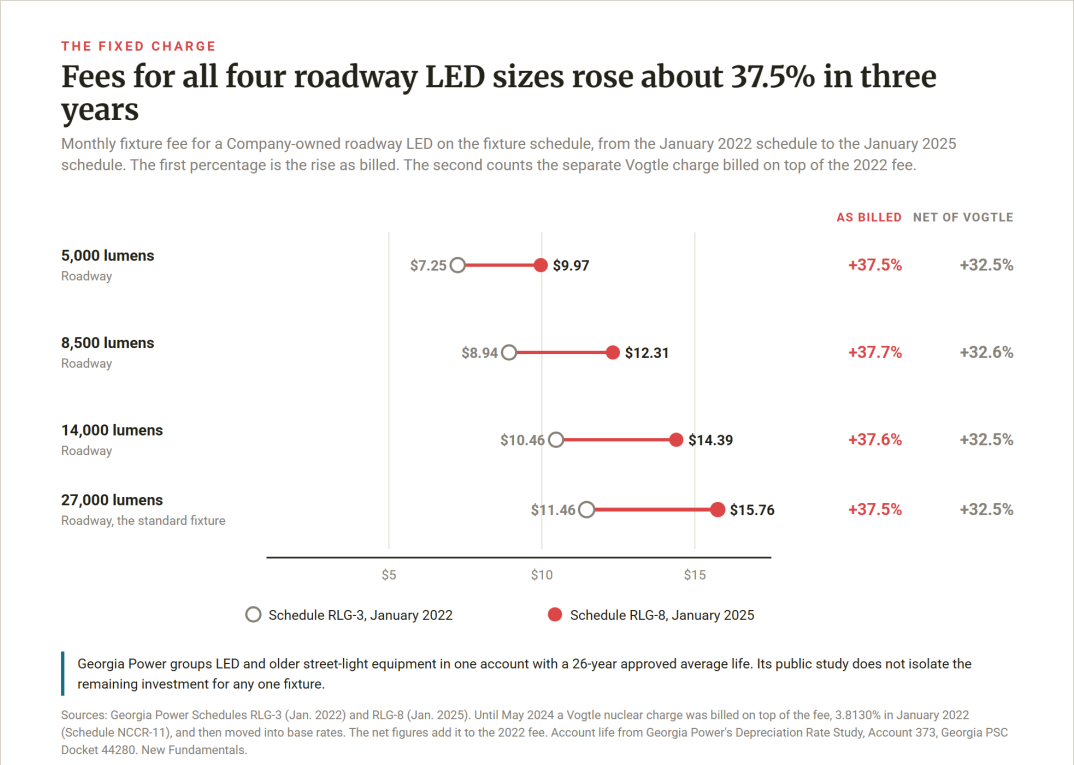


Figure 2. Georgia Power's roadway LED fixture fees, January 2022 and January 2025.

Alpharetta shows how the fee was set at the start. In December 2018 the city's public works staff told the council that converting to LED would save $81,246.84 a year. Georgia Power had counted 4,467 city street lights it could convert.[14] The saving was Georgia Power's figure too. Its slide deck for the city said the LED fixtures were "priced comparable" to the sodium and metal-halide lights they replaced, and the projected saving is the difference between its monthly totals for the old lights and the new. The service was Georgia Power's standard regulated rate. Each authorization form priced the lights on the tariff then in force and warned that "future PSC approved tariff changes could change the estimated total."

The whole projected saving came from one swap. About 1,086 of the city's largest lights, 1,012 of them floodlights, were to be replaced with a standard roadway LED priced about $7,120 a month less in total. On the other 3,381 lights the LED rate was the same as the old rate or slightly higher, about $349 a month more across all of them.[14] Georgia Power priced the LEDs at about the same price as the old lights from the first day, so any saving depended on which fixtures a city happened to have.

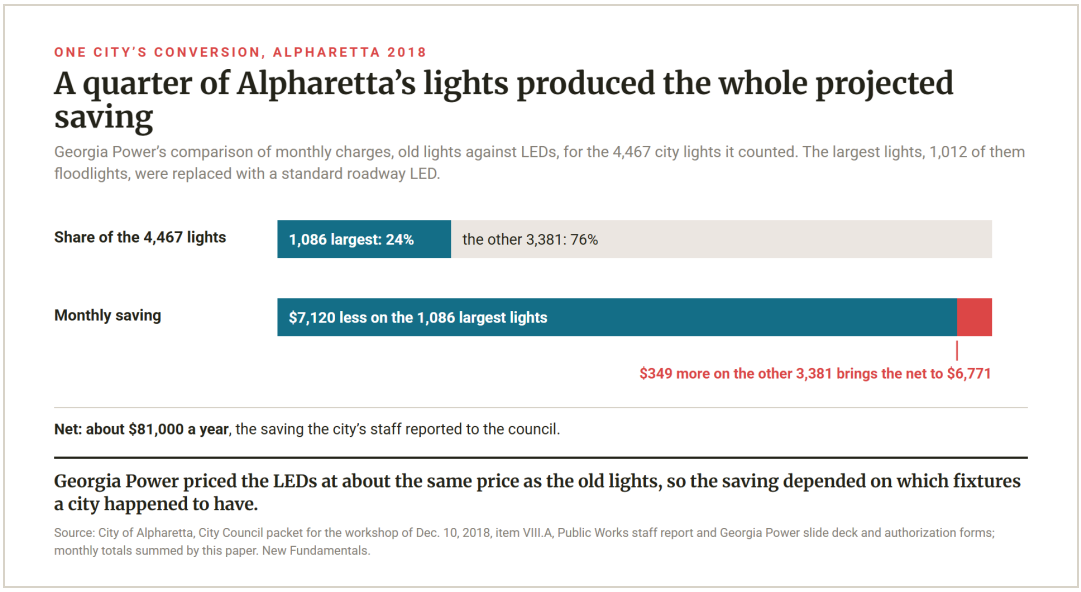


Figure 3. Alpharetta's 2018 LED conversion: the lights and the projected saving.

The work began in March 2019. The city's budgets cannot show whether the saving arrived. The budget's public works utility line covers every utility the department pays. The 2019 budget also moved about $200,000 of street lights, previously paid by subdivisions, onto the city's bill. The street lights cannot be picked out of it.[14] No public record this paper's authors found shows the saving either way. Only the city's own Georgia Power bills, read light by light, could.

Georgia Power forecast its street-light maintenance 66% above 2021

The maintenance cost moved the same direction as the fee. Georgia Power's 2022 cost-of-service study reports about $6.4 million of street-light maintenance on the local-government lighting rate for 2021, and projects about $10.6 million for the twelve months to July 2023, a rise of about 66%.[10]

Four things limit that comparison:

1. The first figure is what the company spent, and the second is what it forecast it would spend.
2. The account holding both covers traffic signals as well as street lights.
3. A related account jumped sharply over the same periods from a very small base. That is what the books look like when a cost moves between accounts rather than grows.
4. The two periods straddle the 2022 inflation spike, when consumer prices rose about 11% and utility wages about 9%.[30]

LEDs went in to cut service visits, and Georgia Power said so at the time.[25] No filing in the 2022 rate case explains why the maintenance cost climbed by far more than inflation. The same rate case says the company's costs overall were moving the other way. Georgia Power's chief executive, Christopher Womack, testified in it that the company had held the growth in its operations and maintenance costs below inflation, budgeting about $1.7 billion of them for 2023 against about $2.0 billion carried in rates.[31]

That leaves three possible explanations, and the filings rule out none of them.

1. If the fee rose to pay for new LED fixtures, the maintenance inside the fee should be flat or falling, and it is not.
2. If maintenance really did rise, the LEDs did not deliver the saving that utilities elsewhere have filed.
3. If the rise is an accounting move between accounts, the Commission can confirm that from the company's books.

Each answer tells the Commission something it does not know now, and only the Commission can make the company give one.

Atlanta's auditors turned up one more data point. In 2022, Georgia Power staff told them the company would charge about $28 a light a month, before energy and riders, to take over and maintain the city's own lights.[32] The filed fixture fee for a light Georgia Power already owns and maintains tops out at $15.76. The two prices cover different lights, the city's lights are older, and the audit states the all-in figure in two different ways. Still, a gap that size is worth a question from the Commission.

Outdoor lighting earned more than the company average

Georgia Power's 2022 cost-of-service study measures what the company earns on each group of customers. In the last year of actual results in that study, 2021, the local-government lighting rate earned a 9.95% return on Georgia Power's investment, against 8.37% for the company as a whole.[10] The company's projection for the twelve months to July 2023 brought that down to 6.24%, just below the 6.27% it projected for the system. That projection already assumed the 66% maintenance increase.

Outdoor lighting as a whole still earned above average in the company's projection: 8.0% or 8.8% depending on the method, against 6.3% for the system, third of eight rate groups.[10] Georgia Power then proposed rates that would raise outdoor-lighting bills 12.3%, riders included, the largest rise of the eight. Its pricing witness, Larry Legg, described the roadway-lighting changes as tidying up fixture and pole options, and offered no cost figures for a single fixture.[11]

The 12.3% and the fee rise above measure different things. The 12.3% was the rise in the whole outdoor-lighting bill for 2023, the first year of new rates, riders included. The 32.5% is one fixture fee, from January 2022 to January 2025.

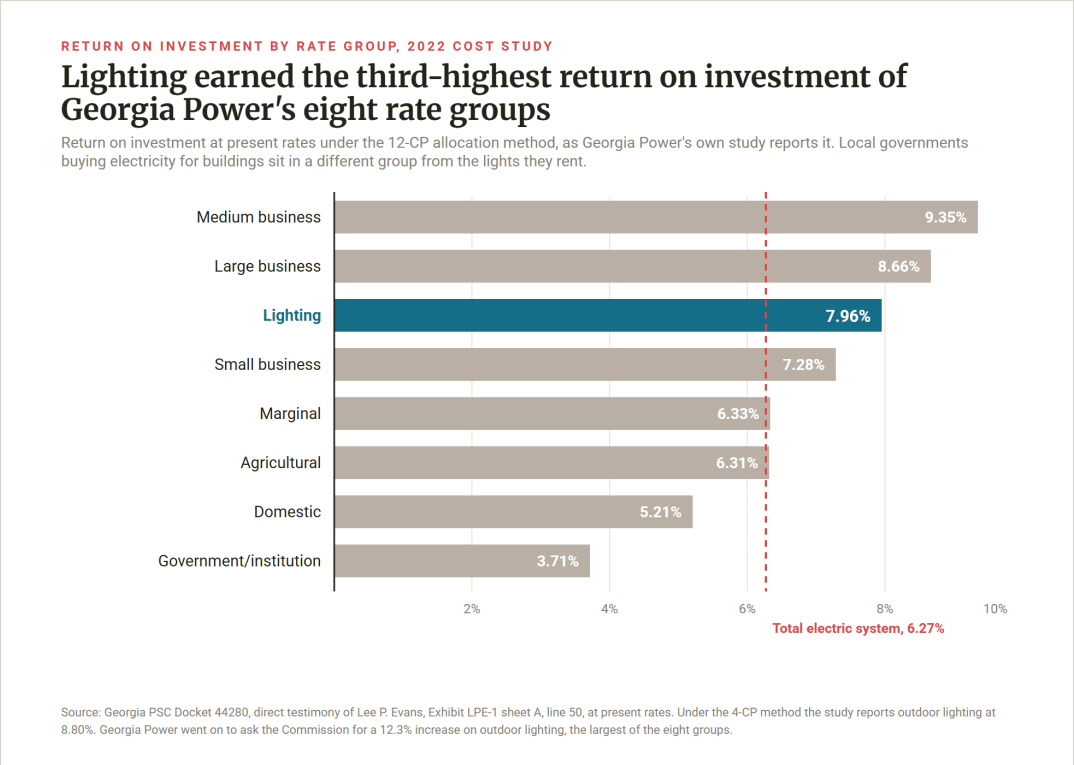


Figure 4. Return on investment by rate group in Georgia Power's 2022 cost-of-service study.

Inside outdoor lighting, the 2022 study separates the fixture fee from the energy charge.

PER YEAR, 2022 STUDY (PROJECTED)	FIXTURE FEE	ENERGY CHARGE
Revenue	$74.8 million	$33.1 million
Net income	$16.5 million	$9.5 million
Investment assigned	$264.7 million	$55.4 million
Return	6.2%	17.1%

The energy charge shows the higher percentage because Georgia Power assigned it far less investment. The fixture fee is where the dollars are. It collects more than twice the revenue and produces more net income.[10]

The records give a total for street lighting and nothing for a single light

Georgia Power’s 2022 cost-of-service study is a spreadsheet. Each row is a kind of cost and each column is a group of customers. Read a column from top to bottom and you have everything the company says that group costs it and everything that group pays.

The study already goes further down than the filing rules require. Lee Evans, the company’s cost-of-service witness, testified that it sorts costs by jurisdiction, by rate group and by individual rate, and the exhibits bear that out. Outdoor lighting for local governments has its own column. For the twelve months to July 2023, that

column holds about $388 million of street-light equipment, $20.8 million of yearly depreciation, $10.6 million of maintenance and $74.8 million of revenue. It also counts 4,506 customers, which is the number of local-government accounts, not the number of lights.[10]

WHAT A COLUMN LOOKS LIKE IN A REAL FILING

One column holds every dollar. No column counts the lights.

Six rows reproduced from Exhibit LPE-1, sheet A, Georgia Power's 2022 rate case. Dollar amounts in thousands; the last two rows are counts.

ROW	LINE DESCRIPTION	RATE SLM	RATE OL GOV	RATE OL NON-GOV	RATE EOL
154	TOTAL REVENUES	141,905.3	74,822.9	30,382.7	33,059.0
490	ACCOUNT 373 – STREET LIGHTING	0.0	388,317.8	111,640.7	0.0
1193	ACCOUNT 373 – DEPRECIATION	0.0	20,778.1	5,973.7	0.0
1066	596 – STREET LIGHTING	0.0	10,574.7	3,040.2	0.0
1327	AVERAGE NUMBER OF CUSTOMERS	1,320	4,506	12,164	21,232
1341	TOTAL METERS	1,321	0	0	0

Outdoor lighting, local governments

NOT ON THE SHEET — How many lights those 4,506 accounts cover · what type each light is · what wattage each light is billed at

Source: Georgia PSC Docket 44280, direct testimony of Lee P. Evans, Exhibit LPE-1 sheet A, projected period ending 31 July 2023. Row numbers and column headers are the exhibit's own. FERC Account 596 covers street lighting and signal systems, and whether signal systems sit in this column is unresolved.

Figure 5. Six rows from Georgia Power's 2022 cost-of-service study.

The record says what street lighting costs Georgia Power in total. It never says what a street light costs.

Four numbers would let a local government or the Commission price a single light, and each answers a different question.

THE NUMBER	THE QUESTION IT ANSWERS
How many lights of each type sit on the local-government rate	How the dollars spread across the lights
The wattage each type is billed at	Whether the energy charge fell after conversion
What each type cost to buy and is still worth on the books	How much of that investment the fee still has to pay back
What each type costs to maintain	How much maintenance really changed when LEDs went in

This paper's authors looked for all four in Georgia Power's 2022 rate case, all 557 public filings in it, in the current and previous outdoor-lighting tariffs, and in the depreciation study. None of the four is there.[15] The depreciation study keeps LED and old sodium fixtures in one account with one approved service life of 26 years, which the study proposed cutting to 23. It cannot separate the two either.[33]

The tariffs have the same gap. Georgia Power's 2015 program bulletin said 65-watt and 90-watt LEDs went in where 100-watt and 150-watt sodium lights came out.[34] But the current fixture schedule sorts LEDs by minimum lumens, the energy schedule bills by wattage, and nothing public links the two. A local government cannot confirm that its energy charge ever fell to the level its new lights warrant.[6]

A local government cannot work around this from the public filings. Depreciation lowers the investment a company earns a return on, so an older light should cost less on that side. Maintenance costs move on their own. The balance between them is a fact about Georgia Power's books, and that is why the Commission has to require the numbers instead of assuming them.[33]

Atlanta could not confirm its own street-light bills, and other local governments' records leave the same gap

Atlanta paid for its own street-light audit in 2022. Auditors sampled 2,843 Georgia Power lights and could not find 36 that Georgia Power's own location data placed in the sample area. They found 105 dark. The bills did not say how many lights they covered. Neither the city nor the company could produce all the service agreements. Transportation staff said the department "mainly relies on the honor system." The auditors concluded "it is impossible to confirm that billing is accurate," and warned that the city may be billed for lights never installed or already removed, and for lighting outside its own jurisdiction. They also asked for the service records that would show whether outage credits were right, and Georgia Power declined to provide them.[12]

A city can count its own lights. It cannot see inside the fee, and it cannot compel the records behind it. No city council, county commission or auditor has that power. The Commission does.

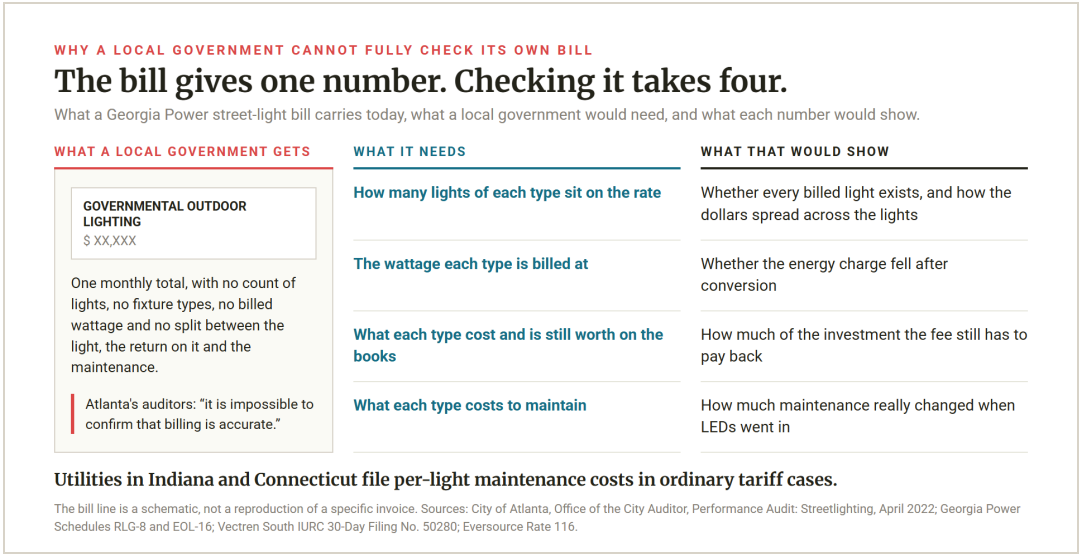


Figure 6. What a street-light bill shows, and the four numbers needed to check it.

Augusta-Richmond County spent $5.1 million on street lighting in 2016 and adopted an $8.6 million budget for 2026, a 68% increase.[13] The climb was not a steady one. From 2017 to 2025 the fund stayed between about $6.0 million and $7.5 million, and most of the rise sits in two steps at either end of the run. That fund covers county-owned lights too, so it is not a Georgia Power bill. Nothing in the county's documents traces the rise to Georgia Power. The county cannot tell, and that is the point. Augusta counted 25,800 street lights

in 2019.[35] Suppose all of them were converted Georgia Power LEDs on the standard tier. By this paper's calculation, the Indiana maintenance benchmark would then be worth about $890,000 a year to the county, and the fee rise since January 2022, after the Vogtle charge, would cost it about $1.2 million a year.

Decatur's bill went up about $1,000 after it converted.[27] Columbus was told at the start it would get no cut in energy cost, and no public document shows whether that held.[26] Georgia Power projected a saving for Alpharetta, and the city's records cannot show whether it arrived. Five local governments, five different records, and the same gap in each. The information they need is held by the company they are asking about.



WHAT LOCAL RECORDS CAN AND CANNOT SHOW

Five local governments, five records, the same gap

Each local government's own documents, and the question each one leaves open.

LOCAL GOVERNMENT	WHAT ITS RECORD SHOWS	WHAT IT CANNOT SHOW
Atlanta 2022 city audit	Auditors sampled 2,843 Georgia Power lights. 36 listed in the company's own location data could not be found, and 105 were dark.	Whether the bill is right. The auditors: "it is impossible to confirm that billing is accurate."
Augusta-Richmond County County budgets, 2016–2026	Street-light fund: $5.1 million spent in 2016, $8.6 million budgeted for 2026, up 68%.	How much of the rise is Georgia Power's fee. The fund pays for county-owned lights too.
Alpharetta Council packet, 2018	Georgia Power projected that LEDs would save the city about $81,000 a year.	Whether the saving arrived. The budget line covers every utility the department pays.
Columbus Council report, 2015	The city was told it "will not receive a reduction in energy cost."	Whether that held. No public document says.
Decatur City commission, 2016	Converted 1,379 lights. The yearly bill rose about $1,000, to about $213,000.	Which charge moved, the energy charge or the fixture fee.

Georgia Power holds the records behind each. The Commission can order the company to file them.

Sources: City of Atlanta, Office of the City Auditor, Performance Audit: Streetlighting, April 2022; Augusta, Georgia, adopted budgets, Fund 276, 2016 to 2026; City of Alpharetta, City Council workshop packet, Dec. 10, 2018, item VIII.A; Columbus Consolidated Government, Council Agenda Report No. 111, May 12, 2015; Decatur City Commission, Mar. 7, 2016, and Atlanta Journal-Constitution, May 2016. New Fundamentals.

Figure 7. What five local governments' records show.

At peer utilities' filed rates, the saving runs to $10.0 million to $13.7 million a year

No filing in Georgia Power's 2022 rate case says what the company spends maintaining an LED street light, so any Georgia figure is an estimate. Two utilities in other states have filed theirs. In Indiana, Vectren South reported about $56 a year to maintain a street light before conversion, and calculated an LED maintenance saving of $34.36 per light per year from its own costs. In Connecticut, Eversource's tariff prices sodium maintenance at $2.32 a month and LED maintenance at $0.23, a difference of $25.08 a year.[8,9] Indiana and Connecticut are not Georgia. Labor costs, territory and accounting all differ. That alone is an argument for Georgia Power to file a Georgia number.

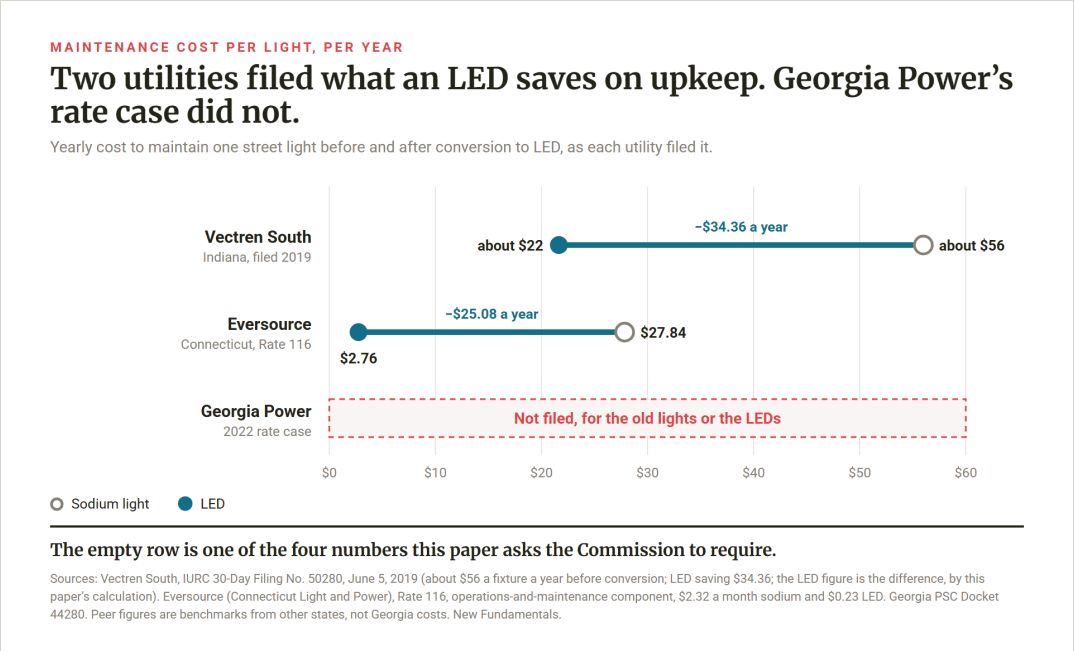


Figure 8. Yearly maintenance cost per light at two peer utilities, and at Georgia Power.

Applied to Georgia Power's roughly 400,000 leased roadway lights, those benchmarks put the yearly maintenance saving at $10.0 million to $13.7 million, by this paper's calculation. Local governments pay about $74.8 million a year in fixture fees, so the saving could be worth 13% to 18% of that bill.[10] That $74.8 million covers every outdoor light Georgia Power rents to a local government, not the roadway fleet alone, so the saving would be a larger share of the roadway bill by itself.

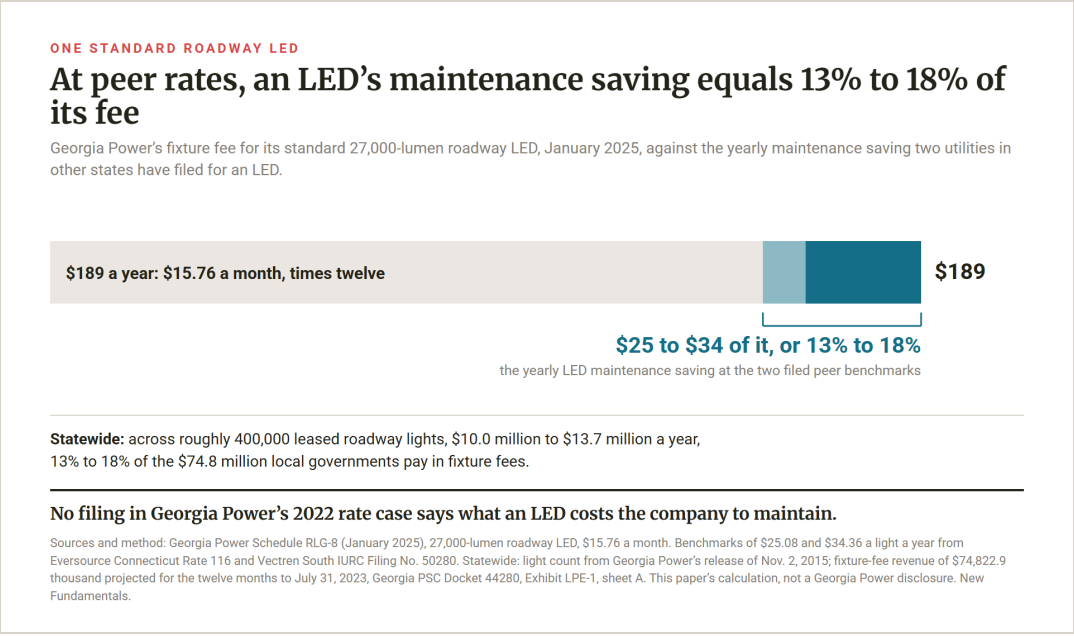


Figure 9. One standard roadway LED's yearly fee against the peer maintenance saving.

The years add up. Run at a full year's rate from 2014, the benchmark range reaches $120 million to $164 million by now, and $140 million to $192 million by 1 July 2028, when the next rate case opens. Both are this paper's calculations. Those are ceilings, not amounts. Georgia Power converted the fleet in phases and has

not filed how many lights it converted each year, so the early years were worth less. That one missing number is the difference between a ceiling and a figure the Commission could rely on.

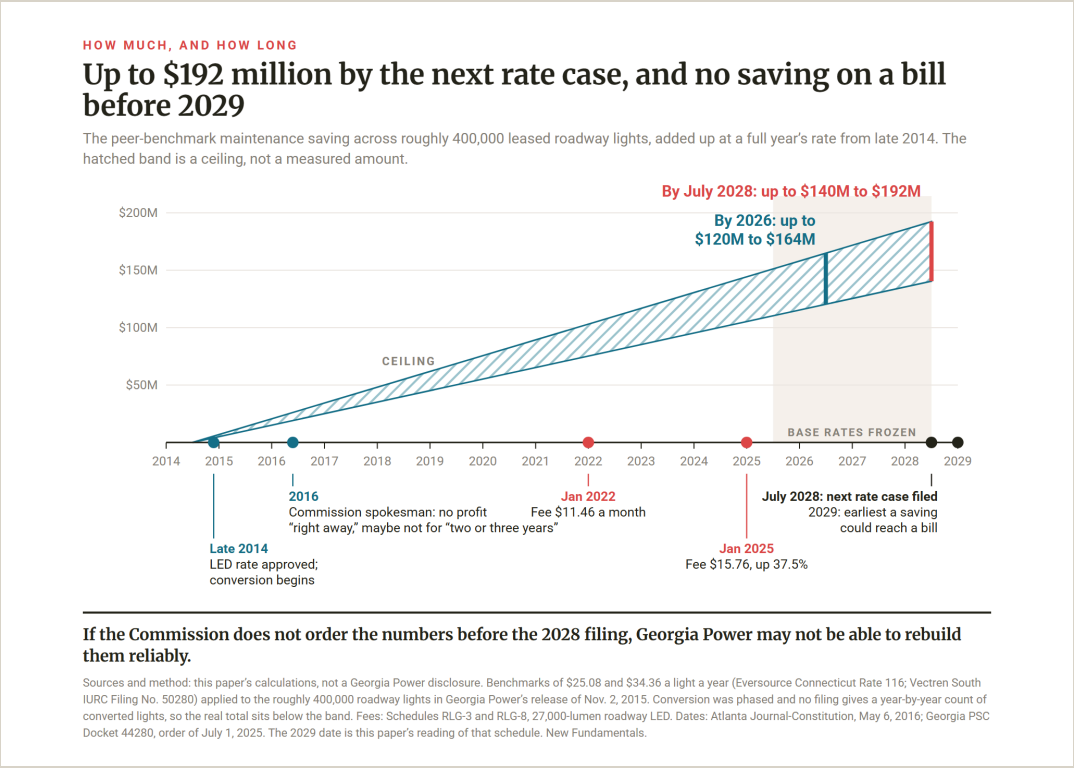


Figure 10. The peer-benchmark saving added up from 2014, with the key dates.

These estimates cover maintenance only. An LED also saves electricity, and a local government's energy charge should have fallen when its lights were converted. This paper puts no amount on that saving, because pricing it needs the wattage each light is billed at, one of the four missing numbers. The Columbus and Decatur records set out above show that the energy saving cannot be assumed either.

No filing in the 2022 rate case or the 2025 extension establishes whether Georgia local governments paid the right amount for their street lights, paid too much for a year or two, or paid too much for a decade.

4. The Solution

The Commission already has the power

Georgia law gives the Commission exclusive power to set just and reasonable rates, and the power to examine and demand a regulated company's books, contracts, records and papers.[16] Commission rules require a utility to file a set list of materials with any request for a general rate increase, including a cost-of-service study. The Commission writes that list, so the Commission decides how far down a filing has to go. No new law is needed.

The rules do not look back. The filing duty starts when a utility asks for an increase. This paper's authors found no rule that requires Georgia Power or the Commission to recheck a price when the technology under it changes, and nothing moves a saving to customers on its own.

The Commission has done this before

In July 2025, when the Commission extended Georgia Power's rate plan, it adopted a stipulation, signed by Georgia Power, requiring the company to file extra cost-of-service detail with its next rate case. That detail has to show how Georgia Power would split the costs of serving new large customers, such as data centers, among its other customers.[17] The existing filings could not answer a question about who pays, so the Commission made the company file enough detail to answer it. Street lighting needs the same kind of order on a much smaller scale. No forecast is involved, because the lights are already in service.

Other utilities file these numbers, and other regulators have acted

Vectren South and Eversource filed per-light equipment and maintenance costs in the ordinary course of setting a rate.[8,9] Regulators in two other states have gone further.

New York's case turned on maintenance. In March 2017 the state's commission approved LED street-light rates for Central Hudson and Orange and Rockland, and set both below what the utilities had asked for. For Orange and Rockland it cut the maintenance built into the LED rate from about 6.7% of the fixture's cost to about 1.5%, holding that LED rates "should reflect a reduced level of maintenance." The New York commission's press release estimated the average saving at about $66 a light a year.[36]

West Virginia's commission reached a lower rate by a different route. In September 2020 it cut the LED rates Mon Power and Potomac Edison had proposed. It found the companies had loaded too much of their wider system costs onto each light, and it struck a one-time conversion fee that it said would chill conversion. It could see the problem because the utilities had filed a revenue requirement for each fixture, broken into its parts.[37]

Legislatures have acted too. California requires its large utilities to offer local governments a tariff to pay for efficiency upgrades to utility-owned street lights over time, with the cost of the upgrade shown separately on the bill.[38] Massachusetts (1997), Maine and Rhode Island (both 2013) gave towns a legal right to buy their street lights from the utility, and as of 2019 nearly every town in Eversource's Massachusetts territory had bought its lights.[39]

The disclosure has to be ordered before the 2028 rate case

The 2025 agreement that extended Georgia Power's rate plan holds base rates flat through 2026, 2027 and 2028, apart from storm costs, and requires the company to file its next general rate case by 1 July 2028.[18] That postponed the rate case that would otherwise have brought updated numbers. In June 2025 three groups in the case asked the Commission to order an illustrative cost-of-service study straight away, limited to the costs of large new customers. The order that followed attached the extra detail to the 2028 filing instead.[40]

So the simple answer to when a local government could see money is 2029 at the earliest, and only if the numbers exist by then. Parties to the 2028 case can ask Georgia Power for information, and the company can answer only from records it has kept. If the Commission never requires Georgia Power to track a figure, the company may not be able to rebuild it reliably in 2028.

The disclosure has to be ordered now and the price argued later. Ordering it costs nothing and rules nothing out.

The Commission faces the same kind of question in an open docket

The Commission is reviewing how revenue credits and costs are divided among Georgia Power's customers, in Docket 57171, *RTP Revenue Credit and Allocation Methodology*. It opened in June 2026 and is still open.[41] That decision may also rest on cost figures the public cannot check, measured against the class cost-of-service study filed in 2022.

Street lighting is the same problem at a size small enough to see whole. It has a countable unit, a published charge, and no filed cost behind either. The two are separate proceedings, and in both the answer is the kind of order the Commission has already written once.

5. Recommendations

For the Public Service Commission

1. Require the disclosure. For the outdoor-lighting rate for local governments, Georgia Power should file four numbers for each type of light, reconciled to the totals already in the cost-of-service study:
    - how many lights of each type sit on the rate;
    - the input wattage each type is billed at;
    - what each type cost to buy and is still worth on the books;
    - what each type costs to maintain.

    This can be ordered now and attached to the 2028 filing. Section 6 adds the other records that would settle what the filings leave open.
2. Test the fixture fee against today's costs. With the disclosure on file, the Commission can check whether each fee matches what is left of the fixture's cost and what it takes to maintain now. No local government should have to rebuild a utility's accounts to earn a reduction the evidence supports.
3. Write the savings into the tariff. Once the Commission decides what share of a confirmed saving goes to local governments, the tariff should name the form that share takes, whether a credit, a lower fee, or something else, and a local government should be able to check the amount from public information.
4. Make the disclosure standing. Whenever equipment replacement, efficiency investment or rate redesign changes what street lighting costs, Georgia Power should file the expected costs and customer savings before a new price takes effect.

For local governments: build the record before 2028

Local governments do not need to wait for the Commission. Anything they gather now becomes evidence for the 2028 rate case, and for any later dispute over what they have paid.

1. Pull the paperwork. Collect every lighting service agreement, authorization form and amendment, especially the ones that carried out the LED conversion, along with any savings projections Georgia Power or staff gave the council. Keep every street-light bill.

2. Build one inventory. Ask Georgia Power in writing for its fixture-level service list for your account. Match it against your own map: every light's location, owner, fixture type, billed wattage, rate schedule, conversion date and working status. A written request also creates a record of what you asked for and when.
3. Run four checks.
    - (a) Does every billed light exist?
    - (b) Was every converted light moved to its lower LED wattage on the energy charge?
    - (c) What does each light cost for a full year, with fixture fee, energy and riders kept separate?
    - (d) Is the local government getting the repair service it pays for?

    Dispute missing lights, wrong wattages and any charge with no address or agreement behind it.
4. Reduce it to one local number: what the fee increases since 2022 cost your government each year, across your actual mix of lights. Keep any maintenance estimate separate and label it a benchmark until Georgia Power files a Georgia figure.
5. Put it on the record. Send a letter or adopt a resolution asking the Commission to require the four numbers, and file it through the Commission's public comment process. Local governments and advocacy groups can file together so the Commission sees a statewide pattern instead of scattered billing disputes. Becoming a formal party to a rate case (an intervenor) is a separate step to take with counsel.
6. Weigh ownership. Asheville, North Carolina, and West Palm Beach, Florida, cut their costs after buying their lights, and Georgia Power's energy schedule already covers customer-owned systems.[42,43] A purchase still needs a verified inventory, a price, a funded maintenance plan and a like-for-like comparison against the current bill.

For residents

The Commission answers to the people who pay these bills, including through local taxes. Anyone can ask the Commission to require Georgia Power to file the four numbers for outdoor lighting on the local-government rate. The Commission takes written comment on any matter through its website, and a comment has to arrive at least 24 hours before the Commission votes.

The Commission hears speakers in person in the first hour of a hearing day and the last 15 minutes of a committee meeting, three minutes each, with sign-up at the Executive Secretary's office an hour before the start. Administrative sessions, where the Commission votes, take no public comment.[44]

Georgia Public Service Commission
File an opinion: psc.ga.gov/public-comments
244 Washington Street SW, Atlanta, Georgia 30334
(404) 656-4501, or (800) 282-5813 toll free

6. What Georgia Power should be asked to show

Georgia Power should show the math. The records below would settle what the public filings leave open, and each is a question or a record to request rather than a finding.

For the Commission to require from Georgia Power:

1. The number of lights on the local-government rate by fixture type and lumen tier, and how many were converted to LED in each year since 2014.
2. The input wattage billed for each LED type, and the date each converted light's energy billing moved to it.
3. The original cost and net book value of each fixture type, with LED and sodium fixtures separated inside Account 373 and a service life for each.
4. Actual maintenance cost by fixture type and year, in Accounts 596 and 585, with traffic signals separated out. What drove the rise from $6.4 million in 2021 to the $10.6 million projected for the year to July 2023, and the jump in Account 585 over the same periods.
5. The build-up of each fixture fee: capital recovery, return, maintenance and overheads, and how the Vogtle charge was folded in when it ended in May 2024.
6. Whether the conversion's installation and stranded costs have been recovered, and when that recovery ends.
7. Individually negotiated lighting agreements:
    - (a) How many government lights sit on these agreements rather than the tariff, and the revenue from them.
    - (b) How the price of that service is set.
    - (c) How the plant, depreciation reserve, maintenance, crews and overheads behind those agreements are kept out of the regulated lighting class, and whether any margin is credited to tariffed customers.
    - (d) The sales commissions paid on them.
    - (e) Which fixtures and sites still qualify for a filed rate.
    - (f) Atlanta's 2022 audit estimated that lights on such agreements averaged about $48 a month, against about $14 for lights on the roadway tariff. The audit also noted that the two kinds sit in different places, such as parks and parking lots.[45]
8. A reconciliation of the Account 373 depreciation reserve as Georgia Power reported it in its depreciation studies and in its cost-of-service studies for the same periods, in each rate case since 2013.
9. Outage and service-request records by account, which Atlanta's auditors asked for and Georgia Power declined to provide.[12]
10. The basis for the takeover price of about $28 a light a month, and $39.90 with riders, that Georgia Power staff quoted to Atlanta's auditors.[32]

For the Commission to ask its own staff: whether the separation of costs between regulated lighting and negotiated lighting agreements has been audited, and under what authority the negotiated service price sits outside the filed tariffs.

For local governments to request and keep:

- the fixture-level service list for each account;
- every lighting service agreement, authorization form and amendment, including the signed LED authorization forms and any savings projection;
- itemized bills separating fixture fee, energy and riders;
- the split between regulated and negotiated lighting on their own lights;
- outage records;
- a purchase price, if they weigh ownership.

The six steps in section 5 set out how to use them.

7. Conclusion

Across the country, the switch to LED street lights saved cities millions of dollars a year. Georgia's local governments rent their lights, and around 2014 they converted on terms Georgia Power described as savings offsetting the installation cost. The conversion cost had a limit. Twelve years later, no filing in the 2022 rate case shows whether Georgia Power has recovered it. The fixture fee rose 32.5% between 2022 and 2025 after the Vogtle charge, and the maintenance cost Georgia Power filed went up instead of down.

The problem sits in the filing rules. Georgia Power files what street lighting costs the company and not how many lights that money covers, so the dollars cannot be turned into a price. A local government reading its bill cannot tell what it is paying for. A commissioner reading the filings cannot either.

Street lighting is a small part of a Georgia Power bill, and a good test of whether a customer can check a bill at all. It has a countable unit, a published price, a documented change of technology, and two utilities in other states that filed the math. A price that was right when it was set does not stay right. Equipment changes, investment depreciates, maintenance costs move, and the charge stays where it was put. This paper's authors found no Commission rule that requires Georgia Power to report the change, and none of that is unique to street lights.

The fix is one order. The Commission wrote one like it in July 2025. This one needs less: no forecast, no new rule, no new law. It needs four numbers for each type of light: how many there are, the wattage each is billed at, what each cost and is still worth, and what each costs to maintain. Section 6 lists them with the other records that would settle what the filings leave open.

That gets Georgians three things: a bill a local government can check, a fee measured against what the service actually costs, and a 2028 rate case with the numbers already in front of it. Once Georgia Power shows the math, local governments, the public and the Commission can all check the fee.

It does not guarantee a refund. But every argument about who should get the savings runs through those numbers, and no local government can make that argument today. That is the reason to require them now.

The People's Power Union is a project of the GCV Education Fund, advocating for lower energy costs and safe, clean energy across Georgia.

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Coalition contact: jamae@gcvoters.org

References

1. Los Angeles: U.S. Department of Energy (Navigant), *Adoption of Light-Emitting Diodes in Common Lighting Applications*, July 2017, p. 51 ("over 170,000 LED streetlights, reducing energy usage by 64% and saving $9 million in annual energy costs"); ESMAP/World Bank, *Los Angeles LED Street Lighting Retrofit*, Oct. 2011 ($56.9 million budget, seven-year payback). Los Angeles owns its lights.
2. New York City: Office of the Mayor, release 343-13, Oct. 24, 2013 ($6 million a year in energy and $8 million in maintenance, projected at announcement). The city owns its lights.
3. Chicago: Pacific Northwest National Laboratory, "Bright Lights + Big City = Millions of Dollars in Savings," Aug. 12, 2020 (210,000 of a planned 270,000 lights replaced; the improvements "should cut Chicago's streetlight energy bills by $10 million each year"). An estimate, not a measured saving. The city owns its lights.
4. Georgia Power, "Georgia Power LED Roadway Lighting Project Underway Statewide," Nov. 2, 2015 (as reported by LEDinside, Nov. 3, 2015). Georgia Power owns and maintains approximately 400,000 roadway lights for local governments and had installed more than 50,000 LEDs. Randy Young, Director of Products and Services: "LED lighting offers long-term energy savings for our customers that offset the installation cost." The release also says LEDs use less energy for the same light output and last longer than high-pressure sodium lights. The 400,000 figure was announced in a press release rather than filed with the Commission. The U.S. Department of Energy's *Outdoor Lighting Challenges and Solution Pathways* (2016) gives larger figures for the same period, about 450,000 roadway lights and 400,000 area lights; the lower roadway figure is used here.
5. Russell Grantham, "'Revolutionary' Street Lights Save Bundles, But Not for Georgia's Cities," *Atlanta Journal-Constitution*, May 6, 2016. The article reports that the Commission approved the LED tariff in late 2014; quotes Georgia Power spokesman Jacob Hawkins that the tariff "offsets" customers' electricity savings and provides "comparable pricing to older technology"; and quotes Commission spokesman Bill Edge that Georgia Power "is not making any money right away" from the new lights, perhaps not for "two or three years," with the tariff designed to recover "stranded costs" such as old fixtures and bulbs as well as capital investment. No primary filing containing these statements was located.
6. Georgia Power Roadway Lighting Governmental schedules: RLG-3 (bills rendered January 2022, filed in the 2022 rate case as the schedule then in force, Georgia PSC document 190559, MFR F-1), RLG-5 (August 2023), RLG-6 (January 2024), RLG-7 (May 2024) and RLG-8 (January 2025). The 27,000-lumen monthly fee: $11.46, $12.75, $13.44, $15.28 and $15.76. From January 2022 to January 2025: 5,000 lumens $7.25 to $9.97; 8,500 lumens $8.94 to $12.31; 14,000 lumens $10.46 to $14.39; 27,000 lumens $11.46 to $15.76, each between 37.5% and 37.7%. The annualized increase as billed for one 27,000-lumen fixture is $51.60. The schedules identify LEDs by fixture type and minimum lumens (Note 7) but state no input wattage; Schedule EOL-16 bills energy on input wattage, and no public schedule links the two. A utility files a tariff change for Commission approval; the prices in force are the prices the Commission approved.
7. Schedules RLG-3 through RLG-6 each carry a Nuclear Construction Cost Recovery clause, charged as a percentage of the base bill; RLG-7 (May 2024) and RLG-8 (January 2025) do not. The rate was 3.8130% under Schedule NCCR-11, in force in January 2022, and 4.1562% under NCCR-13, from August 2023. Georgia Power told the Commission on April 26, 2024 (Docket 29849) that "as part of this rate change, the NCCR recovery rider will cease," with new tariffs taking effect in May 2024, after Vogtle Unit 4 entered commercial service. With the charge added, the January 2022 fee for a 27,000-lumen fixture is $11.90, and the rise to $15.76 is $3.86 a month, 32.5%, or $46.36 a year. On the other tiers the rise after the Vogtle charge is 32.5% to 32.6%. The environmental compliance and demand-side riders also changed in May 2024, and their rates at the other dates were not located, so this netting covers the Vogtle charge only. Fuel and the municipal franchise fee are left out on both sides. This paper's calculation from the filed schedules.
8. Vectren South, Indiana Utility Regulatory Commission 30-Day Filing No. 50280, filed June 5, 2019. The filing reports annual street-light operations and maintenance of about $56 per fixture, with bulb replacement making up 75% of it. It applies an 82% LED saving to the bulb-replacement cost and calculates annual maintenance savings of $34.36 per fixture. Used here only as a labeled peer

benchmark; it is not Georgia Power's figure.

9. The Connecticut Light and Power Company d/b/a Eversource Energy, Rate 116 (Street Lighting Service), effective July 1, 2026. The tariff lists fixture wattage and separate monthly customer, demand, operations-and-maintenance, and equipment charges. The operations-and-maintenance component is $2.32 a month for a sodium fixture and $0.23 for an LED, a difference of $25.08 a year. These are distribution components and are not directly comparable to Georgia's bundled fixture fee.

10. Georgia Power 2022 rate case, direct testimony of Lee P. Evans and Exhibits LPE-1 through LPE-8 (Georgia PSC Docket 44280, filed June 24, 2022), sheet A, column GOV under the RATE OL header. Projected test year, twelve months ending July 31, 2023 (LPE-1/LPE-2), amounts in thousands: Account 373 street-lighting plant $388,317.8; Account 373 depreciation $20,778.1; Account 596 maintenance of street lighting $10,574.7; total revenues $74,822.9; total investment $264,734.3; net income $16,511.7, a 6.24% return; average customers 4,506; no meters. The energy-for-outdoor-lighting column: revenue $33,059, investment $55,364, net income $9,452, a 17.07% return. Outdoor lighting as a rate group returns 7.96% (12-CP) and 8.80% (4-CP) against a system return of 6.27%, third of eight groups. Historic year, calendar 2021 (LPE-3/LPE-4), same column: revenue $76,347; investment $248,466; net income $24,714, a 9.95% return, against a system return of 8.37%; Account 596 maintenance $6,363.8. The GOV column covers all governmental outdoor lighting, not only the roadway fleet. FERC Account 596 covers street lighting and signal systems; whether signal systems sit in this column is unresolved. The related operations account (585) rose from $2.2 thousand to $86.2 thousand between the two periods.

11. Georgia Power 2022 rate case, direct testimony of Larry T. Legg, Director of Pricing and Rates (Docket 44280). His 2023 bill-impact table for the first rate year gives Outdoor Lighting the highest increase of eight rate groups, 12.3%, against a system average of about 10.2%, and it includes the effects of the base-rate increase and the updated environmental, demand-side and municipal franchise fee riders. He describes the Roadway Lighting Governmental changes as clarifying fixture and pole options and closing one fixture to future enrollments, without fixture-level cost support.

12. City of Atlanta, Office of the City Auditor, *Performance Audit: Streetlighting*, April 2022 (File #21.07), reviewing July 2018 through March 2021. The audit covers 56,620 lights, 40,204 of them Georgia Power-owned. Auditors counted 2,843 regulated lights in 27 randomly sampled land lots, could not find 36 lights that Georgia Power's location data placed in the sampled land lots, and found 105 inoperable (3.7%). The audit states that the bills do not show the number of lights billed; that Transportation staff "mainly relies on the honor system for accuracy"; that service agreements could not all be produced, "so it is impossible to confirm that billing is accurate"; that the city "may be overbilled for streetlighting, billed a flat rate for uninstalled/removed lights, and/or billed for lighting outside of its jurisdiction"; and that Georgia Power declined to provide service-request data.

13. Augusta, Georgia, adopted budgets, Fund 276 (Street Lights). Actual expenditures: 2016 $5,126,660; 2019 $5,961,373; 2020 $6,040,099; 2021 $6,285,815; 2023 $6,718,296; 2024 $7,530,249; 2025 $6,816,752 (as reported Dec. 23, 2025). Adopted budgets where no actual was located: 2017 $6,056,940; 2018 $6,122,970; 2022 $6,498,940. 2026 adopted budget $8,621,670. Fund 276 covers all county street lighting, including county-owned lights, and no budget document attributes the rise to any cause.

14. City of Alpharetta, City Council packet for the workshop of Dec. 10, 2018, item VIII.A, "Georgia Power LED Street Lights." The Public Works staff report (p. 268) says Georgia Power "determined the City has 4,467 street lights that can be converted" and that, on the usage and maintenance rates of the sodium and LED fixtures, the city would save $6,770.57 a month, or $81,246.84 a year. Georgia Power's attached slide deck, "LED Roadway Lighting, Alpharetta LED Roadway Project" (pp. 269 to 273), says on its fifth slide that "LED Roadway fixtures are priced comparable to the HID fixtures they are replacing," and gives the fixtures to be removed as $87,495.08 a month and the LEDs as $80,724.51. Four Georgia Power forms titled "Governmental Regulated LED Roadway Lights Authorization" (pp. 274 to 277) price each line as an "Estimated Monthly Regulated Charge" and state: "The estimated monthly regulated charge is based on Georgia Public Service Commission (PSC) approved tariffs in place at the signing of this document. Customer understands that actual usage and future PSC approved tariff changes could change the estimated total." By this paper's sums from the forms, the 1,086 lights of the 400-watt class (74 cobraheads and 1,012 floodlights, each replaced by a 27,000-lumen roadway LED) account for a reduction of $7,120.06 a month, and the other 3,381 lights for an increase of $349.49. The forms in the packet are unsigned. The figures cover Georgia Power lights only; Sawnee EMC ran a separate conversion. The work began in March 2019 (*Atlanta Journal-Constitution*, Mar. 5, 2019). City of Alpharetta FY2019 budget (about $200,000 added to move street lights previously paid by subdivisions onto the city's bill) and FY2020 budget (electric utilities reduced $140,000, "including the forecasted impact of replacing much our lighting stock with LED fixtures"). Public Works utility actuals were $1,779,627 in FY2019 and $1,814,759 in FY2020, a line covering every utility the department pays.

15. Georgia Power 2022 rate case, Docket 44280; 557 items in the Commission's public filing index reviewed, together with the current and previous outdoor-lighting tariff sheets. No reviewed filing or tariff provides an LED's installed cost, the input wattage assigned to each billed light, a count of lights on the local-government rate, or maintenance expense per LED. This review did not cover Georgia Power's earlier rate cases or the late-2014 proceeding that approved the LED tariff.

16. O.C.G.A. § 46-2-23 (exclusive power to determine just and reasonable rates); O.C.G.A. § 46-2-20 (power to examine and compel production of books, contracts, records and papers); Commission Rule 515-2-1-.04(5) (Minimum Filing Requirements with a general rate-increase application).

17. Georgia PSC Docket 44280, document 223495, Attachment 1, Stipulation to Extend the Alternate Rate Plan, para. 15: "In addition to filing a Cost-of-Service Study as a part of its next base rate case, the Company shall include additional Cost-of-Service data with sufficient detail to show how the Company proposes to allocate the forecasted costs relating to the new capacity for large load

customers … as well as the forecasted revenues from the prospective new large load customers … to the various customer rate groups." The Commission adopted the stipulation in full.

18. Georgia PSC Docket 44280, Order Granting Joint Petition and Approval of the Stipulation to Extend the Alternative Rate Plan, document 223495, decided July 1, 2025. Para. 2: base rates "will not be adjusted for the next three years (2026, 2027, and 2028)," except storm costs. Para. 15: "By July 1, 2028, the Company shall file testimony and exhibits required in a general rate case," with a test period of Aug. 1, 2028 to July 31, 2029.

19. American Council for an Energy-Efficient Economy, M. Suozzo, *LED Traffic Signal Market Transformation: An Update with Boston-Area Case Studies*, Report A011, February 2001. It reports the U.S. Environmental Protection Agency's 2000 estimate that replacing all incandescent U.S. traffic signals would save about 2.7 billion kWh, "saving American taxpayers an estimated $225 million per year," and Philadelphia's 1997 retrofit of 28,000 red signals at an estimated $576,000 a year in power and about $165,000 in maintenance. The Energy Policy Act of 2005 set a federal efficiency standard for traffic signals, effective 2006.

20. LED share of U.S. street and roadway lights: U.S. Department of Energy (Navigant), *Adoption of LED Lighting in the U.S.*, Aug. 2020 (2018 data), 28.0% in 2016 and 48.6% in 2018. The Department's Municipal Solid-State Street Lighting Consortium was set up in 2010 to share technical information and field experience with cities. ACEEE, *Reducing Energy Use in Public Outdoor Lighting* (2015), reports street lighting at 25% to 50% of a municipal energy bill.

21. Seattle: Seattle City Light, *Powerlines*, Nov. 8, 2013 (more than 40,000 residential streetlights, "an estimated $2.4 million in annual energy and maintenance costs"). Seattle City Light is the city's own utility.

22. Lawrence Berkeley National Laboratory, *Regulatory Issues and Approaches to Municipal LED Street Lighting Conversions*, February 2017, identifying the lack of LED tariffs, LED tariffs that are not lower than conventional rates, and ownership problems as the main regulatory barriers, and noting that Georgia Power began offering an LED rate at municipal customers' request "although the tariff is no lower, and perhaps slightly higher, than for conventional lighting."

23. Maryland Energy Administration, *LED Streetlight Conversions in Maryland & Virginia: Opportunities, Challenges, and Strategies in 2020*, Sept. 29, 2020, p. 27.

24. Georgia Power Schedule EOL-16, Energy for Outdoor Lighting Service (January 2024). Photo-controlled monthly charge = fixture input wattage (including ballast) / 1,000 x 360 hours x 6.3030 cents per kWh. A 250-watt sodium cobrahead carries an input wattage of 306 watts. Wattages not listed in the table, which include most LEDs, are billed by the same formula (Note 4).

25. Georgia Power's Nov. 2, 2015 release, cited above, says LEDs use less energy for the same light output and last longer than high-pressure sodium lights. The Vectren South filing cited below documents the maintenance difference.

26. Columbus Consolidated Government, Council Meeting Agenda Report No. 111, Proposal for LED Roadway Lighting, May 12, 2015: "The City will not receive a reduction in energy cost."

27. Decatur City Commission, March 7, 2016, conversion of 1,379 sodium and mercury-vapor lights at no capital cost to the city. The *Atlanta Journal-Constitution* (May 2016) reported the resulting annual bill at about $213,000, roughly $1,000 higher; the assistant city manager said the city was converting for environmental reasons. Not independently confirmed against the city's contract.

28. Consumer Price Index for All Urban Consumers, not seasonally adjusted, Bureau of Labor Statistics series CUUR0000SA0: 281.148 in January 2022 and 317.671 in January 2025, a rise of 13.0%. Read Oct. 1, 2026. Had the $11.90 starting price, Vogtle charge included, risen with inflation, it would have been about $13.45 in January 2025, against the $15.76 fee. This paper's calculation.

29. Georgia Power, June 2026 storm-case base-rate changes: 1.6693% for Schedule RLG and 1.6772% for Schedules EOL and TOU-EOL, applied across Georgia Power's tariffs.

30. Between the study's two periods (calendar 2021 and the twelve months ending July 2023), the Consumer Price Index for All Urban Consumers rose about 10.9% and average hourly earnings in utilities (NAICS 22) about 9.2%. Bureau of Labor Statistics series CUUR0000SA0 and CEU4422000003, read Sept. 15, 2026. Neither index measures what it costs to maintain a street light.

31. Georgia Power 2022 rate case, direct testimony of Christopher C. Womack, Chairman, President and CEO (Docket 44280, filed June 24, 2022): "Despite inflation and increased labor and healthcare costs over the last three years, the Company has worked hard to hold O&M cost escalation below the rate of historical inflation, budgeting approximately $1.7 billion in 2023 compared to the approximately $2.0 billion of O&M currently in rates." This is company-wide expense and is not netted against the street-lighting figure.

32. City of Atlanta audit, pp. 13 and 31. Georgia Power staff told auditors the monthly charge to take over formerly city-owned lights would be about $28 a light plus regulated energy and applicable riders; the audit elsewhere states $39.90 a light with riders. The quote covers Atlanta's own, older lights rather than new roadway LEDs on the fixture schedule, and a takeover could include recovering the cost of the assets, so the two figures are not a like-for-like comparison.

33. Georgia Power 2022 rate case, Appendix Exhibit 2, Depreciation Rate Study (Docket 44280). FERC Account 373 (Distribution Outdoor Lighting) carries an approved average service life of 26 years, which the study proposed shortening to 23, on a plant balance of $426.9 million, with LED and legacy fixtures in the same account at the same life. Under cost-of-service ratemaking a utility earns a return on net, undepreciated plant. Jim Lazar, *Electricity Regulation in the US: A Guide*, 2nd ed. (Regulatory Assistance Project, 2016), sec. 8.2.6.3.

34. Georgia Power, *Bright Ideas*, Summer 2015. The first conversion phase replaced 100-watt and 150-watt sodium cobraheads with 65-watt and 90-watt LEDs.

35. Augusta, adopted budget for fiscal year 2020, Engineering performance measures, p. 211: 25,800 street lights in 2019. The budget does not say how many are leased from Georgia Power. 25,800 multiplied by Vectren South's $34.36 is $886,488. 25,800 multiplied by $46.36, the rise after the Vogtle charge for a 27,000-lumen fixture, is $1,196,088. Both are this paper's illustrations and assume every light is a converted Georgia Power LED on the standard tier.

36. New York State Public Service Commission, Case 16-E-0616, Central Hudson Gas & Electric Corp., *Order Approving Addition of LED Street Lighting Options with Modifications*, and Case 16-E-0226, Orange and Rockland Utilities, *Order Approving Tariff Amendments with Modifications*, both issued and effective March 10, 2017. In the Orange and Rockland order (pp. 6 to 7) the Commission reduced the operations and maintenance built into the LED rate from about 6.7% of luminaire cost, the level of the old sodium fixtures, to about 1.5%, holding that "the LED rates, therefore, should reflect a reduced level of maintenance." For Central Hudson it priced fixtures at the lowest vendor quote and lengthened the assumed LED life from 12 to 20 years. The $66 is from the Commission's press release of March 9, 2017: "The average savings for the replaced fixtures is approximately $66, annually, per street light."

37. Public Service Commission of West Virginia, Case No. 20-0461-E-T, Monongahela Power Co. and The Potomac Edison Co., Commission Order of Sept. 30, 2020. The Commission reassigned shared production, transmission and distribution plant, and the operations and maintenance on it, by each fixture's wattage rather than its price (pp. 3 to 9), and struck a one-time conversion charge that it said would have "a chilling effect on conversion" (p. 12). The utilities' per-fixture revenue requirements, broken into components, are in Appendix A. The order notes that the utilities "have not included a revenue requirement component for direct maintenance of the LED Luminaires" (p. 10).

38. California Assembly Bill 719 (Hernández), Stats. 2013, ch. 616, adding Public Utilities Code § 384.5. The statute required each electrical corporation with at least 100,000 service connections to file a tariff letting a local government fund energy efficiency improvements to utility-owned street light poles and repay the cost over time. Subdivision (b): "The cost of the improvement shall be identified separately rather than included within the charge for electrical service." Whether the tariffs were filed and used was not confirmed.

39. Massachusetts G.L. c. 164, § 34A, enacted in 1997 with the Electric Restructuring Act, lets a town buy its lights at the utility's unamortized investment, net of salvage. Maine 35-A M.R.S. § 2523 (P.L. 2013, c. 369) requires the utility to allow the transfer, with the Maine PUC setting "a fair and equitable cost." Rhode Island's Municipal Streetlight Investment Act, R.I. Gen. Laws § 39-30-3 (2013), prices the purchase at original cost less depreciation and amortization, net of salvage. Maryland Energy Administration (2020), cited above, p. 24: "As of 2019, nearly all Massachusetts cities and towns in the Eversource Energy service territory … have purchased their streetlights."

40. Direct testimony of John D. Wilson on behalf of the Natural Resources Defense Council, Sierra Club and the Southern Alliance for Clean Energy, Georgia PSC document 222977, filed June 12, 2025 in Docket 44280. Wilson recommends that the Commission "direct Georgia Power to file an illustrative cost-of-service study and updated resource procurement practices," to be completed in time for any direction to be implemented in the next rate case. The study he asks for is scoped to the costs and revenues of new large-load customers. Street lighting is not mentioned in the testimony.

41. Georgia PSC Docket 57171, "RTP Revenue Credit and Allocation Methodology," filed June 2, 2026, listed as open on the Commission's docket page as of Sept. 14, 2026. No procedural schedule for the docket was located.

42. U.S. Department of Energy, *Outdoor Lighting Challenges and Solution Pathways*, 2016. Asheville, North Carolina, bought its poles and LED fixtures from Progress Energy (now Duke Energy); DOE reports about $450,000 in annual savings across 7,400 lights. West Palm Beach, Florida, bought its lights from Florida Power & Light and cut its monthly charge from $9.96 to $2.71 a light, though second-phase costs rose. These do not establish what a Georgia local government would save.

43. Georgia Power Schedule EOL-16 (January 2024) applies to company-owned and customer-owned systems; Note 5 defines a customer-owned system.

44. Georgia Public Service Commission, *Public Comment Guidelines* (effective Aug. 1, 2022), and public-comments page, psc.ga.gov/public-comments.

45. City of Atlanta audit, pp. 6 to 7 and 18 to 19, and Exhibit 10. The audit calls these lights unregulated and says they are governed by individual agreements rather than the tariff, make up 5.3% of the city's lights and 16% of its estimated monthly lighting cost, and sit in parks, parking lots and places without the poles and wiring regulated lights need. Exhibit 10 gives an estimated average monthly cost, riders included, of $47.51 across 2,989 such lights against $13.98 across 34,888 lights on the roadway schedule. The audit also reports that Georgia Power sales representatives receive a commission for selling them. The averages are the auditors' estimates, and the two kinds of light differ in fixture, pole and site.