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BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION

DOCKET NOS. 39971 AND 9574

Re: Joint Request of Atlanta Gas Light Company, AGL Resources Inc., and The Southern Company for a Finding that Southern Company's Merger with AGL Resources Complies With Applicable Law.

and

Re: SouthStar Energy Services LLC d/b/a Georgia Natural Gas; Application for a Natural Gas Marketer Certificate of Authority

STAFF'S EIGHTH SET OF DATA REQUESTS TO SOUTHERN COMPANY

**TO: BRANDON F. MARZO
DREW WOOLDRIDGE
TROUTMAN SANDERS (SOUTHERN COMPANY)
600 PEACHTREE STREET, NE
SUITE 5200
ATLANTA, GA 30308**

Docket Nos. 39971 & 9574

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COMES NOW the Georgia Public Service Commission Staff (“Staff”) and, pursuant to the authority vested in it by the Georgia Public Service Commission (“Commission”) pursuant to O.C.G.A. § 46-2-57, herein propounds the following interrogatories and requests for production of documents (collectively, “data requests”), to be answered under oath by Southern Company, (“Southern Company”) or its designated representatives. Pursuant to Commission Utility Rule 515-2-1-.04, Staff requests that an original and Three (3) copies be filed with the Executive Secretary of the Commission. If there are any Trade Secret responses, please provide original and Three (3) copies. **Accompanied therewith shall be electronic versions of the filing, which shall be made on a CD ROM containing an electronic version of its filing in Microsoft Word® for text documents or Excel® for spreadsheets.**

Please provide responses on or before 4:00 p. m. on March 15, 2016.

INSTRUCTIONS

- a) These requests shall be deemed to be continuing. The Respondent is obliged to change, supplement, and correct all answers to requests to conform to available information, including such information as first comes available to the Respondent after the answers are hereto filed.
- b) The answers provided should first restate the question asked and also identify the person(s) supplying the information.
- c) All information is to be divulged that is within the knowledge, possession, control, or custody of the Respondent or may be reasonably ascertained thereby.
- d) As used herein the “document” included, but is not limited to, the original and all copies (regardless of origin and whether or not including additional writing thereon or attached thereto) of memoranda, reports, books, manuals, instructions, directives, records, forms, notes, letters, notices, confirmations, telephone calls, meetings or other communications, bulletins, transcripts, diaries, analyses, summaries, correspondence and enclosures, circulars, opinions, studies, investigations, questionnaires and surveys, work sheets, and all drafts, preliminary versions, alterations, modifications, revisions, changes, amendments and written comments concerning the foregoing, in whatever form, stored or contained in or on whatever medium including computerized memory or magnetic media.

Information Request

Docket No. 39971 and Docket No. 9574

- STF-8-1. Please provide Atlanta Gas Light Company profile measurements for five years, including:
- a. Distribution O&M cost
 - a) Per customer
 - b) Per mile of main
 - c) Per dollar of plant
 - b. Revenue dollars per customer
 - c. Operating Income dollars per customer
 - d. Customers per mile of main
 - e. Administrative & General expenses per customer
 - f. Distribution plant per mile of main
 - g. Capital Expenditures /dollar of depreciation
- STF-8-2. Please provide Monthly gas storage utilization over a five year period, showing total owned and contracted storage contrasted to storage utilized.
- STF-8-3 Please provide Pipeline Safety annual audit findings, concentrating on sub-sections M, O and P which contain findings for maintenance, pipeline safety and integrity management for both distribution and transmission.

**CERTIFICATE OF SERVICE
DOCKET NOS. 39971/9574**

IN RE: Joint Request of Atlanta Gas Light Company, AGL Resources Inc., and The Southern Company for a Finding that Southern Company's Merger with AGL Resources Complies With Applicable Law.

And

IN RE: SouthStar Energy Services LLC d/b/a Georgia Natural Gas; Application for a Natural Gas Marketer Certificate of Authority

I, the undersigned, do herewith certify that I have caused to be served the required copies of the enclosed Staff's Eighth Set of Data Requests to Southern Company. All parties are being provided an electronic copy:

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DOCKET NOS. 39971/9574

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DOCKET NOS. 39971/9574

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Respectfully submitted, this 24th day of
February, 2016



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