

BEFORE THE
GEORGIA PUBLIC SERVICE COMMISSION
STATE OF GEORGIA

IN RE: ATLANTA GAS LIGHT
COMPANY'S NOTICE OF
CONTINUED SUSPENSION OF
DISCONNECTION FOR NON-
PAYMENT AND JOINT PETITION OF
ATLANTA GAS LIGHT COMPANY
AND PUBLIC SERVICE
COMMISSION STAFF TO CREDIT
BASE RATE CHARGES BILLED TO
MARKETERS

Docket Nos. 42315, 43115

**JOINT PETITION OF MARKETER GROUP FOR
SUPPLEMENTAL ORDER ADDRESSING CUSTOMER BASE
CHARGE CREDITS DUE TO SONP BACKLOG**

Presented on behalf of:

**Colonial Energy, Inc.
Constellation NewEnergy – Gas Division, LLC
Fireside Natural Gas, LLC
Gas South, LLC
Infinite Energy, Inc.
Kratos Gas & Power
Mansfield Power and Gas, LLC
North American Power and Gas, LLC
SCANA Energy Marketing, LLC
Stream Gas SPE, LLC
True Natural Gas, LLC
Walton EMC Natural Gas
XOOM Energy Georgia, LLC
SouthStar Energy Services LLC d/b/a Georgia Natural Gas**

September 14, 2020

**L. Craig Dowdy
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Atlanta, Georgia 30339**

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GEORGIA PUBLIC SERVICE COMMISSION
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IN RE: ATLANTA GAS LIGHT
COMPANY’S NOTICE OF
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STAFF TO CREDIT BASE RATE
CHARGES BILLED TO MARKETERS

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**JOINT PETITION OF MARKETER GROUP FOR SUPPLEMENTAL ORDER
ADDRESSING CUSTOMER BASE CHARGE CREDITS DUE TO SONP
BACKLOG**

COLONIAL ENERGY, INC., CONSTELLATION NEWENERGY – GAS DIVISION, LLC, FIRESIDE NATURAL GAS, LLC, GAS SOUTH, LLC, INFINITE ENERGY, INC., KRATOS GAS & POWER, MANSFIELD POWER AND GAS, LLC, NORTH AMERICAN POWER AND GAS, LLC, SCANA ENERGY MARKETING, LLC, STREAM GAS SPE, LLC, TRUE NATURAL GAS, LLC, WALTON EMC NATURAL GAS, XOOM ENERGY GEORGIA, LLC, SOUTHSTAR ENERGY SERVICES LLC D/B/A GEORGIA NATURAL GAS, hereinafter collectively referred to as the “Marketer Group”, hereby file this Joint Petition of Marketer Group for Supplemental Order Addressing Customer Base Charge Credits Due to SONP Backlog.

Whereas, on March 13, 2020, Governor Kemp declared a public health state of emergency due to the COVID-19 pandemic;

Whereas, after considering both the health implications and the economic implications of disconnecting a customer, Atlanta Gas Light Company (AGL), suspended

Shutoffs for Non-Payment (SONP) on March 14, 2020;

Whereas, the suspension of SONPs was originally for seven days and applied to residential and commercial customers and on March 16, 2020, AGL extended the moratorium on SONPs until April 13, 2020;

Whereas, on April 8, 2020, Governor Kemp extended Georgia's shelter-in-place order until May 1, 2020 and the public health state of emergency through May 13, 2020 and in light of this extension and the increasing number of COVID-19 cases, AGL continued the moratorium on SONPs for customers that would otherwise be disconnected from the AGL system but for the COVID-19 pandemic until the suspension was lifted by the Commission;

Whereas, on April 7, 2020, the Marketer Group filed an Emergency Joint Petition of Marketer Group For Expedited Establishment of COVID-19 Natural Gas Assurance Program, requesting, among other things, that AGL suspend invoicing the Marketers all pass-through charges for SONP-eligible customers starting April 13, 2020 and continuing for the remainder of the moratorium;

Whereas, the Marketer Group filed an Amended Emergency Motion on April 9, 2020 requesting that AGL credit Marketers all AGL base charges for customers who would have been shut off for non-payment but for the moratorium;

Whereas, on April 13, 2020, AGL filed a Notice of its intent to extend the moratorium on SONPs until such time as the Commission determined the suspension should be lifted, or at least until April 30, 2020, along with a Joint Petition with Staff requesting that the Commission grant AGL the authority to credit the base rate charges

billed to the Marketers for SONP-eligible customers;

Whereas, by Order of April 30, 2020 (“Order”), the Commission extended the moratorium on SONPs for residential and commercial customers until such time as the Commission determined the suspension should be lifted;

Whereas, in the April 30 Order the Commission stated that an extension of the moratorium on SONPs might contribute to higher than normal bad debt for the Marketers and found it reasonable to authorize AGL to issue credits to the Marketers for uncollected AGL base charges billed to Marketers and ordered that AGL credit base charges to the Marketers for SONP-eligible customers during the moratorium on SONPs for accounts that Marketers have charged off and for AGL to recover the lost revenue related to such credits through the Georgia Rate Adjustment Mechanism (“GRAM”);

Whereas, in its Order of June 22, 2020, the Commission ordered that AGL could resume working SONPs effective July 1, 2020 with certain potential exceptions for customers who are sick, medically vulnerable, or over the age of 65;

Whereas, the extended suspension of SONPs through the moratorium has created a significant backlog of SONPs to be worked by AGL that will require Marketers to be responsible for SONP eligible customer base charges long after the July 1, 2020 lifting of the suspension;

WHEREAS, at the time the suspension was lifted AGL forecast that there would be a backlog of 62,706 outstanding SONPs through the end of June, 76,536 through the end of July, 90,343 through the end of August, and 102,619 through the end of September and AGL estimated it would take 13 to 14 weeks to address the backlog of SONPs;

Whereas, in the above-mentioned April 13 Joint Petition of AGL and Commission Staff to credit base rate charges billed to marketers (“Petition”) AGL and Commission Staff stated **“In this manner, Marketers will be held harmless for base charges that they would not owe if SONPs were proceeding normally”** (emphasis added);

Whereas, SONPs will not be proceeding normally until the SONP backlog created by the moratorium has been completed;

And Whereas, ambiguity exists as to the when the current customer base charge credits to Marketers should end under the existing Orders;

WHEREFORE, Petitioners respectively request that this Commission grant this Petition and issue an Order providing as follows:

(a) that SONP Eligible Customers are defined as customers that were or could have been submitted by a Marketer for disconnection but were not disconnected because of the moratorium on SONPs that was in place from March 14 until June 30; and

(b) that such credits to Marketers for the customer base charges for SONP Eligible Customers shall apply from the date of request or potential request of the SONP through the date the SONP eligible customer has been disconnected by AGL.

Respectfully submitted this 14th day of September, 2020.



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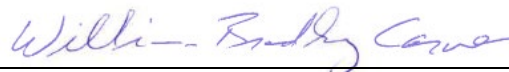
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CERTIFICATE OF SERVICE

I hereby certify that the foregoing **JOINT PETITION OF MARKETER GROUP FOR SUPPLEMENTAL ORDER ADDRESSING CUSTOMER BASE CHARGE CREDITS DUE TO SONP BACKLOG** was filed in Docket 42315 with the Georgia Public Service Commission's Executive Secretary by hand delivery. An electronic copy of same was served upon all parties listed below by electronic mail, unless otherwise indicated, or sent by U.S. First Class Mail addressed as follows:

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This 14th day of September, 2020.



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