**BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION**

|  |  |  |
| --- | --- | --- |
| ***In Re*:** **ATLANTA GAS LIGHT COMPANY’S INTEGRATED CAPACITY AND DELIVERY PLAN (i-CDP) - LNG** | **)****)****)****)** | **DOCKET 43820** |

## **STAFF’S EIGHTH SET OF DATA REQUESTS TO THE**

**ATLANTA GAS LIGHT COMPANY**

TO: BLAKE O’FARROW

 DIRECTOR – REGULATORY AFFAIRS

 ATLANTA GAS LIGHT COMPANY

 TEN PEACHTREE PLACE

 ATLANTA, GA 30309

 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 Atlanta Gas Light Company, (“AGLC” or “Company”) or its designated representatives. The Company shall file with the Executive Secretary’s Office using the Alternative E-filing instructions. Public and Trade Secret responses shall be Accompanied therewith shall be an electronic version in Microsoft Word® format for text documents and Excel® for spreadsheets.

 Please provide responses on or before 4:00 p. m. on  **January 5, 2023.**

## **INSTRUCTIONS**

1. 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.
2. The answers provided should first restate the question asked and also identify the person(s) supplying the information.
3. All information is to be divulged that is within the knowledge, possession, control, or custody of the Respondent or may be reasonably ascertained thereby.
4. 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.

**Docket No. 48320**

**Information Requests – LNG**

**Please note: All questions refer to Atlanta Gas Light Company's Cherokee LNG Expansion -- LNG Tracker Quarterly Report No. 2 filed on September 1, 2022 in this Docket.**

1. Per AGL’s response to STF-7-6, for the second LNG tracker filed report, AGL stated that LNG from the Cherokee LNG expansion may not be available to provide the incremental LNG supply indicated in the i-CDP for 2023 and 2024. AGL states further that it has already considered this contingency and how to mitigate such a circumstance. Per AGL’s response, AGL stated in the filed and approved 2022-2025 Capacity Supply Plan, AGL will seek added bundled peaking if the expected additional vaporization capability described in the plan is somehow delayed. However, in testimony by Witness Becker, Witness Becker discusses potential seller nonperformance issues for bundled peaking service. In addition, Witness Becker stated that AGL is not aware of any expansion projects on either pipeline serving AGL. Because these pipelines are fully subscribed, securing new bundled peaking service could be unachievable. Please provide all work papers, bundled peaking supply market availability information, potential bundled peaking service offers, and documents and correspondence related to AGL’s due diligence efforts aimed at potentially securing new bundled peaking service contracts.