MARK D. CAUDILL, LLC
ATTORNEY AT LAW

June 30, 2023

Ms. Sallie Tanner
Executive Secretary
Georgia Public Service Commission
244 Washington Street, S.W.
Atlanta, GA 30334-9052

RE: Docket No. 45083
Liberty Utilities (Peach State Natural Gas) Corp. 2023 – 2024 Gas Supply Plan

Public Disclosure Filing of the 2023 – 2024 Gas Supply Plan

and

Trade Secret Filing of Liberty Utilities' 2023 – 2024 Gas Supply Plan

Dear Ms. Tanner:

Liberty Utilities (Peach State Natural Gas) Corp. hereby files its 2023 – 2024 Gas Supply Plan in the above-referenced docket. I am filing this letter, a Petition, the pre-filed direct testimony of Tatiana Earhart, Exhibits I through VI, and a Statement of Compliance with the Minimum Filing Requirements as set forth in Commission Rule 515-7-2-.04. Also enclosed is a Trade Secret Filing, by which Liberty Utilities is providing to Staff Trade Secret copies of the Gas Supply Plan.

Please call if you have any questions. Thank you.

Sincerely,
MARK D. CAUDILL, LLC
Attorney for Liberty Utilities
(Peach State Natural Gas) Corp.



Mark D. Caudill

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STATE OF GEORGIA
BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION

IN RE:	)	
	)	
LIBERTY UTILITIES (PEACH STATE NATURAL GAS) CORP. 2023 – 2024 GAS SUPPLY PLAN	)	**DOCKET NO. 45083**
	)	
	)	

PETITION FOR APPROVAL OF THE 2023 – 2024 GAS SUPPLY PLAN FILING OF LIBERTY UTILITIES (PEACH STATE NATURAL GAS) CORP.

Liberty Utilities (Peach State Natural Gas) Corp. ("Liberty Utilities" or the "Company") hereby files with the Georgia Public Service Commission ("Commission") its 2023 – 2024 Gas Supply Plan ("Plan"), including this petition requesting approval of the Plan in the above-referenced docket. In support of this petition, Liberty Utilities submits the following:

1. This gas supply plan filing is made pursuant to Georgia's gas supply plan and adjustment factor statute, O.C.G.A. § 46-2-26.5, which directs the Company to file a gas supply plan and adjustment factor by August 1 of each year.

2. The Company's 2023 – 2024 Gas Supply Plan is described in the filing cover letter, this petition, the Company's pre-filed testimony, forecasts, exhibits, Statement of Minimum Filing Requirements, and supporting materials filed in this docket.

3. The Company is filing the design day forecasts for the 2023 – 2024 Gas Supply Plan Year as directed by the Commission's Procedural and Scheduling Order of April 11, 2023, consistent with the Commission-approved Addendum to Stipulation in the 2022 – 2023 Gas Supply Plan, Docket No. 44392. The design day forecasts for the 2023 – 2024 Gas Supply Plan are included as Exhibit II to the pre-filed direct testimony of Tatiana Earhart, Liberty Utilities' Manager, Gas Supply Operations, filed with this Petition.

4. In the above-referenced Procedural and Scheduling Order, the Commission provided an opportunity for the Company to file direct testimony on or before June 30, 2023, for the gas supply plan recovery year beginning October 1, 2023.

5. Contemporaneously herewith, the Company is filing the pre-filed direct testimony of Tatiana Earhart, together with the exhibits (numbered I through VI), Statement of Compliance with Minimum Filing Requirements, and other materials referenced therein. The Company hereby gives notice to Staff and to any intervening parties that it intends to use the forecasts, supporting information, exhibits, and charts attached to or embedded within the pre-filed testimony as well as any attached or imbedded charts, graphs and illustrations contained within the pre-filed testimony (including both direct and rebuttal testimony, if any) in the hearing on this matter.

WHEREFORE, Liberty requests that this Commission approve the 2023 – 2024 Gas Supply Plan as filed and specifically approve, acknowledge or authorize, without limitation, the following:

1. Approve the Company's 2023 – 2024 Gas Supply Plan, including the Company's projected design day forecast along with the Company's annual requirements forecast to serve customers in both the Gainesville service areas (including the certificated service areas in and around Gainesville, including but not limited to Hall and Jackson Counties) and the Columbus service areas (including the certificated areas in and around Columbus, including but not limited to areas in Muscogee, Talbot, Meriwether and Harris Counties);

2. Approve the proposed array of supply and capacity assets that will be used to serve those requirements, more specifically including, but not limited to:

   a. Interstate storage in the amounts specified in the Exhibits to Ms. Earhart's pre-filed direct testimony;
   b. Interstate transportation in the amounts specified in the Exhibits;
   c. Natural gas commodity to be provided pursuant to Asset Management Agreements;
   d. Authority to issue new RFPs and enter into contracts to renew or replace Asset Management Agreements ("AMAs") for up to an additional two years for the Columbus service areas and the Gainesville service areas (in the event that the new agreements currently authorized to be renewed are for 12-month, rather than 24-month agreements, and thus would expire during or at the end of the 2023 – 2024 Plan Year);

e. Authority to enter into a new for a new citygate bundled peaking services contracts for (i) the Gainesville service areas for no less than five days during the 2023 – 2024 winter heating season, for a maximum daily quantity ("MDQ") of 3,200 Dth/Day to provide approximately a 5% margin above the forecasted firm design day requirement for Gainesville service area customers; and, (ii) the Columbus service areas for no less than five days during the 2023 – 2024 winter heating season, for a maximum daily quantity ("MDQ") of 6,200 Dth/Day to provide approximately a 5% margin above the forecasted firm design day requirement for Columbus service area customers;

f. Authority to issue new RFPs to renew or replace the contract referenced in subparagraph (d) above (either in connection with the new AMAs or independent thereof) for citygate bundled peaking services for Gainesville area for up to an additional two winter heating seasons;

3. Approve the adjustment factors proposed by the Company to recover its purchased gas costs during the recovery year, together with the calculations that produce such factors;

4. Approve a continuation of the Company's Gas Supply Hedging Plan described within this Gas Supply Plan filing including continued use of the layered, ratable hedging implementation through the 2023 - 2024 Plan Year for up to 30% of winter volumes; and, approve hedging of up to 10% (or one-third of the overall 30%) of winter purchases to be hedged through the third winter ahead, resulting in hedges that would extend through March 30, 2027, as explained in the pre-filed direct testimony of Ms. Earhart; and, authorize the Company to recover costs associated with the hedging plan through the purchased gas cost adjustment (PGA) mechanism;

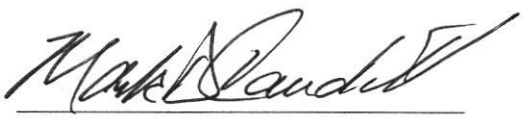
5. Authorize the extension of the current Performance-based Regulation ("PBR") program through September 30, 2026 (originally approved in Docket No. 6753-U, modified in Docket No. 25013-U, and reauthorized and extended in Docket Nos. 34118, 35876, 36793, 38137, 39388, 40291, 41154, 41870, 42316, 42965, 43811, and 44392);

6. Authorize Liberty to file changes in PGA rates, through the end of the 2023 – 2024 Gas Supply Plan Year (September 30, 2024), that will become effective in as few two days following the filing; and

7. Grant such additional approvals and authorizations as are necessary and / or desirable for the Company to accomplish the goals, objectives and tasks identified as part of the Liberty Utilities (Peach State Natural Gas) Corp. 2023 – 2024 Gas Supply Plan.

This 30th day of June 2023.

Respectfully submitted,
MARK D. CAUDILL, LLC, Attorney for Liberty Utilities (Peach State Natural Gas) Corp.



By: Mark D. Caudill

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STATE OF GEORGIA
BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION

IN RE:

LIBERTY UTILITIES (PEACH STATE NATURAL GAS) CORP. 2023 – 2024 GAS SUPPLY PLAN	)	**DOCKET NO. 45083**

TRADE SECRET FILING OF
LIBERTY UTILITIES (PEACH STATE NATURAL GAS) CORP.

Simultaneously with this filing, Liberty Utilities (Peach State Natural Gas) Corp. ("Liberty Utilities" or the "Company") is filing with the Georgia Public Service Commission ("Commission") the Company's 2022 - 2023 Gas Supply Plan ("Plan"), which includes the pre-filed direct testimony of Tatiana Earhart, together with the exhibits ("Exhibits") sponsored as part of the Company's Plan. These Exhibits contain materials that are of a proprietary and trade secret nature. Additionally, Liberty Utilities is providing Excel-based models and supporting information (collectively, the "Models") that Calculate Design Day and Final Delivery Capacity Summaries for the Company's service areas in and around Columbus and Gainesville in the above-referenced docket. The Exhibits, Models, and supporting information contain data, materials, information, and processes that are of a proprietary and trade secret nature. Liberty Utilities is therefore filing the proprietary and trade secret Models and portions of these Exhibits pursuant to Commission Rule 515-3-1-.11 governing trade secrets. Additionally, the data and information are exempt from public disclosure under O.C.G.A. § 50-18-72(a)(34).

The Models and Exhibits contain information, more specifically identified in Appendix A attached hereto, that the Company deems to be proprietary. The Company is providing the trade secret documents and information as part of its 2022 – 2023 Gas Supply Plan because they contain information that is required by the Commission's Rules and Minimum Filing Requirements to be filed as part of a gas supply plan. The information derives economic value to the Company and to the Company's customers from not being generally known to others. Liberty Utilities submits the data and pricing information are highly confidential and competitively sensitive. Accordingly, consistent with the Company's own interests, and the interests of its customers, the Company protects against disclosure of this information.

Pursuant to the terms of Commission Rule 515-3-1-.11, Liberty Utilities is providing information under protective seal (each page is marked "Trade Secret"). The trade secret documents have been numbered and the Company is maintaining a master list of these documents. Additionally, the affidavit of Manuel Cifuentes is attached hereto.

Respectfully submitted this 30th day of June 2023.

MARK D. CAUDILL, LLC, Attorney for
Liberty Utilities (Peach State Natural Gas) Corp.



By: Mark D. Caudill

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Appendix A to the
TRADE SECRET FILING OF
LIBERTY UTILITIES (PEACH STATE NATURAL GAS) CORP.
Docket No. 45083
June 30, 2022

List of Exhibit Pages Either Omitted or Redacted Within the Public Disclosure Documents as Trade Secret	
Exhibit Number	**Page Numbers**
Exhibit I	None
Exhibit II	3, 4, 6, 7
Exhibit III	1, 6, 7, 8, 13, 15
Exhibit IV	1, 6, 8, 12, 13, 15
Exhibit V	1, 2, 4, 5, 7, 8, 10, 11, 13, 14
Exhibit VI	1

BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION
STATE OF GEORGIA

IN RE:	)	
	)	
LIBERTY UTILITIES (PEACH STATE NATURAL GAS) CORP.'S 2023 – 2024 GAS SUPPLY PLAN	)	**DOCKET NO. 45083**

AFFIDAVIT FOR TRADE SECRET FILING

STATE OF MISSOURI)

COUNTY OF JASPER)

Tatiana Earhart, first being duly sworn, deposes and says that she is familiar with the contents of the accompanying Trade Secret records, reports, and Trade Secret Filing, and that to the best of her knowledge and belief, the information in the records and reports constitute trade secrets pursuant to Article 27 of Chapter 1 of Title 10 as set forth in the accompanying Trade Secret Filing.

Signed this 27 day of June, 2023.

By: Tatiana Earhart
Tatiana Earhart, Manager,
Gas Supply Operations
Liberty Utilities

SUBSCRIBED AND SWORN TO before me, the undersigned authority

this 27 day of June, 2023.

My Commission Expires: Nov. 16, 2026

Sherri J. Blalock
Notary Public

SHERRI J. BLALOCK
Notary Public - Notary Seal
Newton County - State of Missouri
Commission Number 14969626
My Commission Expires Nov 16, 2026

BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION

IN RE:	)	
LIBERTY UTILITIES (PEACH	)	
STATE NATURAL GAS) CORP.'S	)	**DOCKET NO. 45083**
2023 – 2024 GAS SUPPLY PLAN	)	

CERTIFICATE OF SERVICE

I, Mark D. Caudill, on behalf of Liberty Utilities (Peach State Natural Gas) Corp., hereby certify this date furnished a copy of the foregoing 2023 – 2024 GAS SUPPLY PLAN, including the COVER LETTER, PETITION, PRE-FILED DIRECT TESTIMONY AND EXHIBITS OF WITNESS EARHART, STATEMENT OF COMPLIANCE WITH MINIMUM FILING REQUIREMENTS, and the TRADE SECRET FILING AND SUPPORTING AFFIDAVIT REGARDING THE EXHIBITS by hand deliver, by email, by depositing a copy of same in United States mail with adequate postage affixed thereto, or by a prepaid overnight delivery service addressed to the following:

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Atlanta, Georgia 30334-9052

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This 30th day of June, 2023.

MARK D. CAUDILL, LLC, Attorney for
Liberty Utilities (Peach State Natural Gas) Corp.

By: _____
Mark D. Caudill

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****By Overnight Delivery Service