Holland & Knight

1180 West Peachtree Street, Suite 1800 | Atlanta, GA 30309 | T 404.817.8500 | F 404.881.0470
Holland & Knight LLP | www.hklaw.com

Lindsey Sciavicco Williamson
(404) 817-8561
lindsey.williamson@hklaw.com

September 19, 2023

Via Alternative Electronic filing

Sallie Tanner
Executive Secretary
Georgia Public Service Commission
244 Washington Street, SW
Atlanta, GA 30334

RE: ATLANTA GAS LIGHT COMPANY'S PETITION TO AMEND THE 2023 UNIVERSAL SERVICE FUND FACILITIES EXPANSION PLAN TO INCLUDE A PROJECT IN JACKSON COUNTY
Docket No. 43510

Dear Ms. Tanner:

Enclosed for filing please find Atlanta Gas Light Company's Petition To Amend the 2023 Universal Service Fund Facilities Expansion Plan To Include a Project in Jackson County. As required by the electronic filing procedures, a copy of this filing will be mailed to the Commission. Thank you for your attention to this matter.

Sincerely yours,

Lindsey A. Williamson

Lindsey Sciavicco Williamson

Enclosures

BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION
STATE OF GEORGIA

IN RE: **ATLANTA GAS LIGHT COMPANY'S 2023 USF FACILITIES EXPANSION PLAN**	**Docket No. 43510**

ATLANTA GAS LIGHT COMPANY'S PETITION TO AMEND THE 2023 UNIVERSAL SERVICE FUND FACILITIES EXPANSION PLAN TO INCLUDE A PROJECT IN JACKSON COUNTY

Atlanta Gas Light Company ("AGL" or "Company") respectfully submits this Petition to the Georgia Public Service Commission (the "Commission"), requesting to amend AGL's 2023 Universal Service Fund ("USF") Facilities Expansion Plan ("2023 Plan") to include a project in Jackson County. AGL incorporates by reference the Minimum Filing Requirements ("MFRs") filed in the above-referenced docket on September 1, 2022 and the amended MFRs filed on October 14, 2022 and November 18, 2022. Amended MFRs supporting this Petition are attached hereto as Exhibit A.

AGL filed its 2023 Plan for Commission consideration in Docket No. 43510 on September 1, 2022. As part of the 2023 Plan, AGL proposed to extend natural gas facilities with support from the USF within Glynn, Henry, Cherokee, Chatham, Wheeler (the Alamo Project), and Baldwin counties as part of its 2023 Plan. AGL filed an amendment to the 2023 Plan on October 14, 2022[1] and a second amendment to the 2023 Plan on November 18, 2022.[2]

[1] The Amended Petition divided the Wheeler (Alamo) County Segment 3 project into two phases to give the Commission the option of further segmenting the project. Additionally, the Amended Petition added the Brantley County project giving the Commission the option to serve the project from Glynn County to the east or Ware County to the west. Lastly, the Amended Petition corrected a calculation error included in MFR-6 Cost to Serve that was filed on September 1, 2022 and removed references to project cost estimates in MFR-7 Project Technical Analyses also filed on September 1, 2022.

[2] The Second Amended Petition requested that the Commission approve the Wheeler (Alamo) County Segment 3 project as one project to be completed in totality instead of dividing the project into two phases.

The Commission issued an Order on December 13, 2022 approving the Chatham County Project and the Alamo Segment 3 Project of the 2023 Plan. Under the Commission's Order, AGL is to recover the estimated $28,126,896 for the Chatham County Project[3] and Alamo Segment 3 Project in the following manner: $9,344,095 from the USF, $6,533,000 from ECON-1 tariff funds available under the $15 million cap from calendar year 2022, and the balance of $12,249,801 from ECON-1 tariff funds under the $15 million cap from calendar year 2023. The unencumbered funds remaining in the 2023 USF is $2,725,159.

AGL requests that the Commission amend the 2023 Plan to include a project in Jackson County. Under the proposed Jackson County Project, AGL would serve a new elementary school, Heroes Elementary School, in Jackson County. The Jackson County Board of Education plans to open Heroes Elementary School in August 2024 for the 2024-2025 school year. To serve this customer, AGL proposes to tie-into existing 4" plastic main on Skelton Road (MAOP 60 psi) and install approximately 2,050 feet of 4" plastic main (MAOP 60 psi) along New Skelton Road and an approximate 250 foot 2" plastic service to serve the facility.

AGL requests to fund the project with unencumbered funds from the 2023 USF, or in the alternative, to use a portion of the USF to cover the customer's Contribution In Aid of Construction ("CIAC"). The total estimated cost to serve this customer is $130,000. Per the typical Rule 8 process, AGL created a BCA for this project that generated a Total Allowable Investment to the customer of $52,522.00. This resulting CIAC based on the estimated cost to serve is $77,478.00. The BCA is attached hereto as Exhibit B.

[3] On May 16, 2023, AGL filed a petition to withdraw Igneo (Georgia) LLC as the customer for the Chatham County Project and replace it with PHA and Seoyon E-Hwa as new customers, and reaffirm that the Chatham County Project may continue as otherwise approved. This petition is still pending per AGL's request. AGL will file an update on or before October 1, 2023.

The Company has determined that the proposed amendment to the 2023 Plan is in the public interest. Therefore, AGL requests approval of an amendment to the 2023 Plan to include the Jackson County Project or to approve an amendment to the 2023 Plan to cover the cost of the customer's CIAC for the Jackson County Project.

Respectfully submitted this 19th day of September, 2023.

HOLLAND & KNIGHT LLP

Robert S. Highsmith Jr.
State Bar of Georgia No. 352777
Lindsey Sciavicco Williamson
State Bar of Georgia No. 783366

Attorneys for Atlanta Gas Light Company

Regions Plaza, Suite 1800
1180 W. Peachtree Street, N.W.
Atlanta, Georgia 30309
Tel. 404.817.8500
robert.highsmith@hklaw.com
lindsey.sciavicco@hklaw.com

BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION
STATE OF GEORGIA

IN RE: **ATLANTA GAS LIGHT COMPANY'S 2023 USF FACILITIES EXPANSION PLAN**	**Docket No. 43510**

CERTIFICATE OF SERVICE

I do hereby certify that I have caused to be served the foregoing **ATLANTA GAS LIGHT COMPANY'S PETITION TO AMEND THE 2023 UNIVERSAL SERVICE FUND FACILITIES EXPANSION PLAN TO INCLUDE A PROJECT IN JACKSON COUNTY**, upon the following parties via e lectronic mail as follows:

Sallie Tanner
Georgia Public Service Commission
244 Washington St., S. W.
Atlanta, GA 30334
stanner@psc.ga.gov

Tony Wackerly
Georgia Public Service Commission
244 Washington St., S.W.
Atlanta, GA 30334
twackerly@psc.ga.gov

Blake O'Farrow
Director, Regulatory Affairs
Atlanta Gas Light Company
Ten Peachtree Place
Atlanta, GA 30309
bofarrow@southernco.com

Billy Horne
Director, Resource Planning & Economic Development
Atlanta Gas Light Company
Ten Peachtree Place
Atlanta, GA 30309
bhorne@southernco.com

This 19th day of September, 2023.

HOLLAND & KNIGHT LLP

Lindsey A. Williamson
Lindsey Sciavicco Williamson

EXHIBIT A

Amended MFR 1

Atlanta Gas Light - Docket 43510
2023 Universal Service Fund
Facilities Expansion Plan
Minimum Filing Requirements

Per Commission Rule 515-7-5-.07, the EDC shall include the following minimum filing requirements in its Annual USF Facilities Expansion Plan filing:

	(a) A detailed written technical description of the project(s). The technical description will include, but not be limited to, a discussion of the type, size, and length of the proposed facilities and the proposed route and the community and/or company that will be served. The technical description will affirmatively state if a proposed approach main line-extension is new main or an extension or expansion of existing main as defined in 515-7-5-.01(j)(k). There will be a discussion of the type and size of main proposed to be replaced. The technical description will affirmatively state if the EDC is or is not certificated to serve in the counties where the facilities will be constructed.

Jackson County

This project proposes to serve a new elementary school in Jackson County. Jackson County BOE plans to open Heroes Elementary School in August 2024 at the beginning of the 2024-2025 school year.

AGL proposes to tie-into existing 4" plastic main on Skelton Road (MAOP 60 psi) and install approximately 2,050 feet of 4" plastic main (MAOP 60 psi) along New Skelton Road and an approximate 250 foot 2" plastic service to serve the facility.

Per the typical Rule 8 process, AGL created a BCA for this project that generated a Total Allowable Investment to the customer of $52,522.00. This resulting contribution in aid of construction based on the estimated cost to serve (see *MFR-6: Cost to Serve*) is $77,478.00

Please see MFR-4, Maps of Proposed Corridors Jackson. AGL is currently certificated to serve this area.

Amended MFR 4

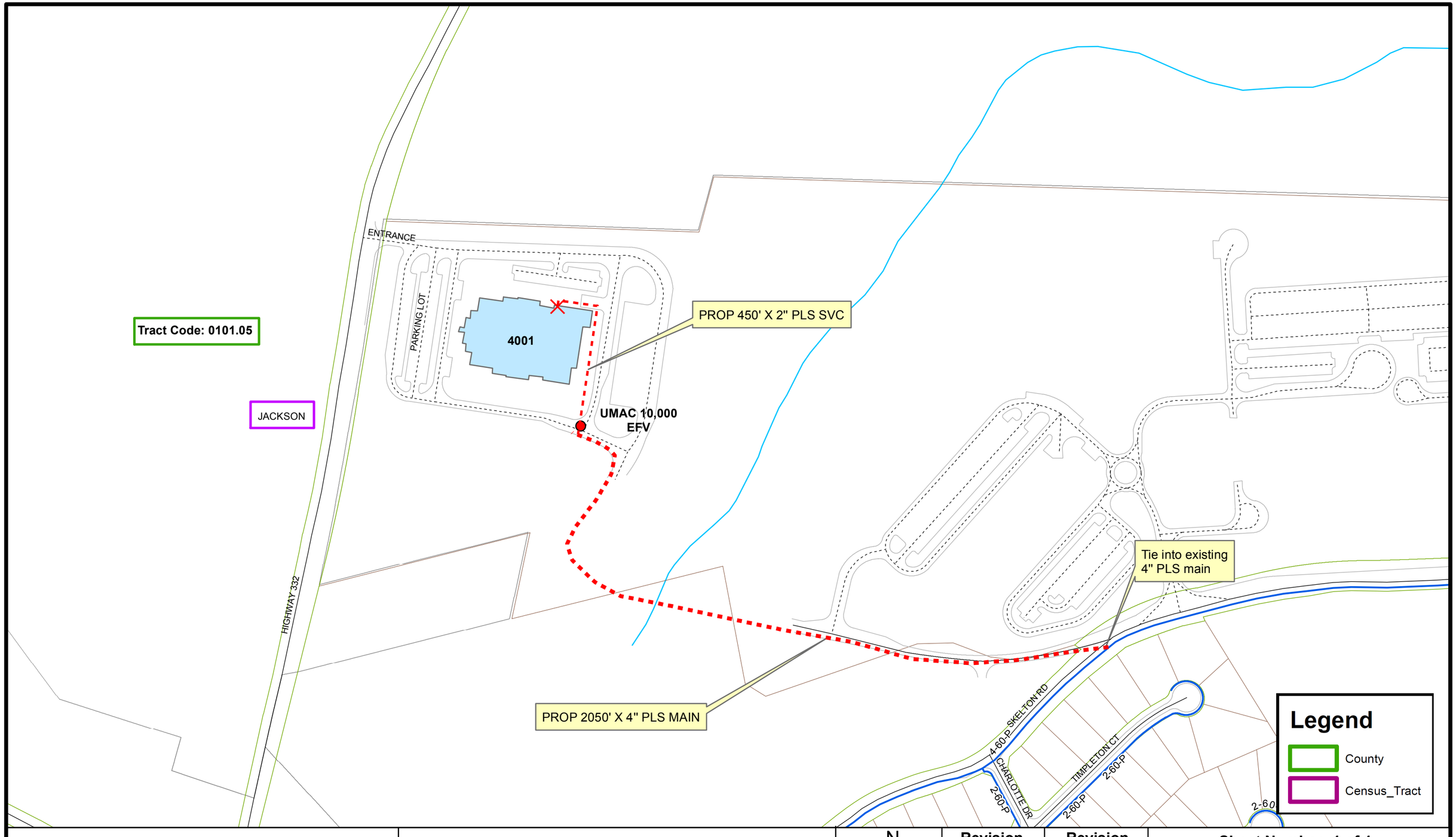
Atlanta Gas Light – Docket 43510
2023 Universal Service Fund
Facilities Expansion Plan
Minimum Filing Requirements

Per Commission Rule 515-7-5-.07, the EDC shall include the following minimum filing requirements in its Annual USF Facilities Expansion Plan filing:

	(d) Provide a detailed map of the project(s) that includes, but is not limited to, the location of the project, route of the line-extension, or location of the CNG station(s).

Please see Attachment *MFR 4 Maps of Proposed Corridors - Jackson*.

MFR 4: Maps of Proposed Corridors - Jackson



Atlanta Gas Light

**1700 Skelton Rd, Hoschton,
GA 30548, USA
Athens Service Center - 3300**

N W E S

Revision Number	Revision Date

Sheet Number: 1 of 1

Drawn By:	VICTORIA CAWTHON
Checked By:	
Date:	8/21/2023

Amended MFR 5

Atlanta Gas Light – Docket 43510
2023 Universal Service Fund
Facilities Expansion Plan
Minimum Filing Requirements

Per Commission Rule 515-7-5-.07, the EDC shall include the following minimum filing requirements in its Annual USF Facilities Expansion Plan filing:

	(e) Provide economic development data related to the project(s) to include, if available, capital investment by a natural gas customer or potential customers in land, builders, equipment, natural gas equipment, and training, the number of jobs that will be created as a result of natural gas service, and the estimated annual payroll of the new customer. The economic development data can discuss known growth in the project area(s), such as known residential and commercial developments.

Jackson County

Name of Company(s)	**Jackson County BOE**
Capital investment by Company(s)	Approximately $37 million.
Jobs created	Approximately 100.
Annual payroll	Unknown
Known residential or commercial growth	New elementary school.
Other information	See MFR-1.

Amended MFR 6

Atlanta Gas Light – Docket 43510
2023 Universal Service Fund
Facilities Expansion Plan
Minimum Filing Requirements

Per Commission Rule 515-7-5-.07, the EDC shall include the following minimum filing requirements in its Annual USF Facilities Expansion Plan filing:

	(f) Provide a Project Financial Analysis ("PFA") electronic Excel spreadsheet with live cells and formulas intact. The PFA spreadsheet will include multiple worksheets with the following: **i. Separate worksheets for each proposed project to include a detailed estimated engineering breakout of construction costs.** **ii. The last worksheet will provide a Cost to Serve table with each project name, the total estimated engineering costs, the gross up for income taxes, the gross up for financing costs, and the total estimated project cost. The total estimated project cost for all projects will be totaled. The proposed projects will be listed alphabetically.** **The EDC may use either estimated engineering costs when calculating cost to serve for an approach main corridor project or CNG station or filed costs when supplementing a Tariff Rule 7 request or Tariff Rule 8 request.**

Please see Attachment *MFR-6 – Cost to Serve.*

Atlanta Gas Light
Estimate Detail
Project: Jackson County - Heroes Elementary
Date: 8/22/2023

Southern Company Gas

Item No.	Element	Quantity	Unit	Rate $	Total $
1	**Land**	**$10,000**			
1.1	**Land Cost**	**$5,000**			
1.11	Temporary Workspace	1.00	acre	5,000.00	5,000
1.2	**Acquisition Labor & Expenses**	**$5,000**			
1.21	ROW allowance, including survey, staking & land agent	1	sum	5,000.00	5,000
2	**Outside Services**	**$0**			
2.1	**NDE Contractor**	**$0**			
2.11		0	sum	0.00	0
2.2	**Environmental**	**$0**			
2.22		0	sum	0.00	0
2.3	**Engineering Design**	**$0**			
2.32		0	sum	0.00	0
2.4	**Program Management**	**$0**			
2.41		0	sum	0.00	0
2.5	**Land Management**	**$0**			
2.51		0	sum	0.00	0
2.6	**Public Relations**	**$0**			
2.61		0	sum	0.00	0
2.7	**Materials Procurement**	**$0**			
2.71		0	sum	0.00	0
2.8	**Legal Cost**	**$0**			
2.81		0	sum	0.00	0
2.9	**Construction Supervision**	**$0**			
2.91		0	sum	0.00	0
2.10	**Taps and Stops**	**$0**			
3	**Materials, including freight and tax**	**$20,586**			
3.1	**Pipe**	**$10,586**			
3.11	2" Plastic Pipe	450	lf	1.43	644
3.12	4" Plastic Pipe	2,050	lf	4.85	9,943
3.2	**Valves & Actuators**	**$0**			
3.31	Included in 3.1	$ -	ea	$ -	$ -
3.3	**Fittings**	**$0**			
3.31	Included in 3.1	$ -	ea	$ -	$ -
3.4	**Miscellaneous Materials**	**$10,000**			
3.41	Included in 3.1	$ -	ea	$ -	$ -
3.42	Meter Set Equipment	10,000	ea	1.00	10,000

4	**Construction**	**$77,811**			
4.1	**Permitting**	**$35,000**			
4.11	Local Permitting & Traffic Control	1	sum	$ 35,000	$ 35,000
4.2	**Construction**	**$42,811**			
4.22	4" Platic Pipe installation	2,050	lf	18.98	38,909
4.23	2" Plastic Svc Install	450	lf	8.67	3,902
4.3	**HDD**	**$0**			
4.31		$ -	ea	$ -	$ -
	subtotal	**108,397**			
5	**Contingency**	**10,840**			
5.1	General Contingency 10%				10,840
6	**Escalation**	**0**			
6.1					
7	**Labor**	**2,500**			
7.1	Direct Internal Labor				2,500
8	**Finance Cost**	**4,206**			
8.1	AFUDC				4,206
	Total				**130,000**

MFR-6: COST TO SERVE

Line	Type	Project	Footage Size/Type	Estimated Engineering Costs	Income Tax Gross-Up	Financing Cost Gross-Up	Cost to Serve
1	Commercial	Jackson	2,050' x 4" plastic	$ 130,000	$ 19,917	$ 746	$ 150,664
			Total:	**$ 130,000**	**$ 19,917**	**$ 746**	**$ 150,664**

Income Tax Ratio	Finance Ratio
0.15321	0.00574

Amended MFR 7

Atlanta Gas Light – Docket 43510
2023 Universal Service Fund
Facilities Expansion Plan
Minimum Filing Requirements

Per Commission Rule 515-7-5-.07, the EDC shall include the following minimum filing requirements in its Annual USF Facilities Expansion Plan filing:

	(g) Provide a Project Technical Analysis ("PTA") electronic Excel spreadsheet with live cells and formulas intact. The PTA spreadsheet will include multiple worksheets with the following: **Separate worksheets for each project to include the engineering details of each project that will include, but not be limited to, the name of the project, type, size, maximum allowable operating pressure ("MAOP"), and length of approach main and service main in feet.** **For a CNG station, the details will include the name of the project, location, and a list of equipment to include, but not be limited to, the following:** **a. Dispensers** **b. Compressors** **c. Storage** **d. Dryer** **e. Valve Panel** **f. Regulators** **g. CNG Equipment** **h. Approach Main** **i. Service Main** **j. Engineering Design** **k. Construction** **l. Overheads**

Please see Attachment *MFR-7 – Project Technical Analysis*.

MFR-7: PROJECT TECHNICAL ANALYSIS

Project Information						Proposed Load	Proposed Main Section 1					Proposed Main Section 2					Proposed Main Section 3					Proposed Service				Cost Estimate		Approvals			
Project Name	Address	Location Code	Project Summary	Requested By	Date Requested	Load (MCFH)	Category	Size	Type	Wall Thickness	Length (ft)	Category	Size	Type	Wall Thickness	Length (ft)	Category	Size	Type	Wall Thickness	Length (ft)	Size	Type	Wall Thickness	Length (ft)	Grand Total	Accuracy	Mgr	Director	VP	EVP
Heroes Elementary 2863130-23N-3300-4001 GA-332 HWY HOSCHTON GA 30548		3300	2,050' x 4" MHP PLS			7.369		4"	PLS		2,050											2"	PLS		450	$130,000	plus or minus 50%				

Note: Steel pipe MAOP 300 psi. Plastic pipe MAOP 60 psi.

Disclaimer

The attached estimate is for planning purposes only and cannot be used as a firm quotation from Atlanta Gas Light or our contractors. We will not be able to provide a firm quote until the project undergoes additional engineering and cost information is solicited from our vendors thru our formal bid process. The costs provided are based on rule of thumb estimates, local knowledge, and/or past history as well as mapping technologies. Keep in mind the estimated installation period can be delayed due to permitting delays and undetected terrain features (boring through rock formations, water crossings, etc.).

EXHIBIT B

COST SUMMARY REPORT

Southern Company Gas

EF1.1

PRIMARY WR: 2863130 BCA_ID: 306582 - 2863130-23N-3300-4001 GA-332 HWY HOSCHTON GA 30548

APPLICANT	null null
ADDRESS	4001 GA-332 HWY Hoschton, GA 30549
COUNTY	JACKSON
SERVICE CENTER	HALL CO SERVICE CENTER

ESTIMATED START DATE	
ESTIMATED COMPLETION DATE	
SERVICE NEEDED BY	Jul 28, 2023
BUILD OUT RATE (UNITS PER YEAR)	-
AFE NUMBER	NA

Cost to Serve (Applied to Allowable Investment)

FACILITY	TOTAL FILED COST
Mains	$90,774.00
Service	$17,370.00
Meters And Regulators	$0.00
Miscellaneous	$0.00
METER AND REGULATOR CHARGE NOT INCLUDED	**$108,144.00**

Customer Charges

FACILITY	TOTAL FILED COST
Mains	$0.00
Service	$0.00
Meters and Regulators	$0.00	
	$0.00

ALLOWABLE INVESTMENT (AI)

RES/COMM	NO_UNIT	DESCRIPTION	LOAD PER UNIT	LOAD_TOTAL	ALLOWABLE INVESTMENT PER UNIT	ALLOWABLE INVESTMENT TOTAL
COMMERCIAL	1	N	7369	7369	$48114.80	$48,114.80
				7369		**$48,114.80**

COST TO SERVE (APPLIED TO ALLOWABLE):	**$108,144.00**
TOTAL CUSTOMER CHARGE :	**$0.00**
TOTAL ESTIMATED COST TO SERVE :	**$108,144.00**
ALLOWABLE INVESTMENT :	**$48,114.80**
SUPPLEMENTAL ALLOWABLE INVESTMENT :	**$5,407.20**
TOTAL ALLOWABLE INVESTMENT :	**$53,522.00**
CUSTOMER CONTRIBUTION BEFORE GROSS - UP :	**$54,622.00**
GROSS-UP FACTOR:	**1.15**
CUSTOMER CONTRIBUTION :	**$63,085.68**
USF AMOUNT:	**$null**
TOTAL DEPOSIT :	**$842.05**
SIMPLE PAYBACK :	**21.41**
BASE REVENUE :	**$5,052.28**
AVERAGE COST PER METER :	**$0.00**

MAINS

Customer Charge ?

CU_ID	CU_DESC	SPAN_LENGTH	QUANTITY	UNIT_FILED_COST	TOTAL_FILED_COST
AGL_COM_4_PLS	EST_AGL_COI	2050	1	$44.28	$90,774.00
					$90,774.00

NO

SERVICES

Customer Charge ?

CU_ID	CU_DESC	SPAN_LENGTH	QUANTITY	UNIT_FILED_COST	TOTAL_FILED_COST
AGL_COM_2_PLS	EST_AGL_COI	450	1	$38.60	$17,370.00
					$17,370.00

NO

METERS AND REGULATORS

Customer Charge ?

CU_ID	CU_DESC	SPAN_LENGTH	QUANTITY	UNIT_FILED_COST	TOTAL_FILED_COST
					$0.00

NO

MISCELLANEOUS COSTS

ID	VOUCHER_CODE	DESCRIPTION	TYPE	TOTAL_FILED_COST
				$0.00