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November 20, 2023

VIA ELECTRONIC DELIVERY

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

Re: ***In re: FireSide Natural Gas, LLC***
Docket No. 25471

Dear Ms. Tanner:

In connection with the above-referenced docket, please find the enclosed Application and Petition of Fireside Natural Gas, LLC for Review and Approval of Amendment to Interim Certificate No. GM-36 Reflecting a Change in Ownership to NextEra Energy Services Georgia, LLC.

Thank you for your assistance with this matter. Please don't hesitate to contact me directly with any questions or concerns.

Sincerely,



Mark E. Moore

Enclosures

BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION

IN RE: FIRESIDE NATURAL GAS, LLC'S **APPLICATION FOR A NATURAL GAS MARKETER CERTIFICATE OF AUTHORITY**	**Docket No. 25471**

APPLICATION AND PETITION OF FIRESIDE NATURAL GAS, LLC FOR REVIEW AND APPROVAL OF AMENDMENT TO INTERIM CERTIFICATE NO. GM-36 REFLECTING A CHANGE IN OWNERSHIP TO NEXTERA ENERGY SERVICES GEORGIA, LLC

NOW COMES Fireside Natural Gas, LLC ("FireSide") (the "Petitioner") and hereby applies to and petitions the Georgia Public Service Commission (Commission) for review and approval, as described below, of (i) a change in CORPORATE OWNERSHIP resulting from a Membership Interest Purchase Agreement (the "Agreement") entered into among NextEra Energy Services Georgia, LLC ("NextEra Energy Services") as buyer and FireSide Holdings Inc. ("FireSide Holdings"), Michael J. Davis ("Davis") and Michael J. Davis Irrevocable Trust (the "Trust") as sellers, and (ii) corresponding amendments to Interim Certificate No. GM-36.

Pursuant to the provisions of FireSide's Interim Certificate Order and Commission Rule 515-7-3-.04 (10), Petitioner requests the Commission specifically review and approve: (1) a change in ownership to NextEra Energy Services and (2) corresponding amendment to Interim Certificate No. GM-36. reflecting same.

In support of the of this application and petition, Petitioner shows the Commission the following:

FireSide Natural Gas Overview

1. FireSide Natural Gas is a natural gas marketing company, certified by the Commission on October 16, 2007, with Interim Certificate GM – 36 in Docket No. 25471-U, to provide natural retail gas solely to commercial customers within the State of Georgia. FireSide is a skilled retail gas marketer that has over 16 years of industry experience serving and meeting the natural gas needs of commercial customers across Georgia.

Purchaser Overview

2. NextEra Energy Services is a Delaware limited liability company whose ultimate parent company is NextEra Energy, Inc. ("NextEra", NYSE: NEE). NextEra is one of the largest power and utility holding companies in North America, and is comprised of two principal businesses, Florida Power & Light Company ("FPL") and NextEra Energy Resources, LLC ("NEER"). FPL is one of the largest electric utilities in the U.S., and NEER is the world's largest generator of renewable energy from the wind and sun, as well as a world leader in battery storage. NEER has undertaken substantial investment in Georgia and has appeared before the Commission on numerous occasions. Specifically, NEER has worked with Georgia Power on multiple power generation projects, all of which have been approved by the Commission.

3. Moreover, NextEra currently oversees gas operations in several markets through the following affiliates:

- FPL Energy Services (Florida): Has 20 years of experience serving 7,000 commercial and industrial customers across 5 local distribution companies.
- Vanguard Energy Services (Illinois): This recently acquired entity has 20 years of experience serving 1,200 commercial and industrial customers across 4 local distribution companies.

- Frontier Utilities (Illinois, New Jersey, Pennsylvania, and Ohio): Has 5 years of experience serving 7,000 residential customers across 7 local distribution companies.

4. Also relevant is NextEra Energy Marketing ("NEM") – NextEra's wholesale energy marketing group – which is the seventh largest supplier of natural gas in the U.S. NEM is active in Georgia, and supplies natural gas to marketers, municipalities, and large industrial customers. NEM currently transports over 10 billion cubic feet of natural gas per year in Georgia.

Transaction Overview

5. On November 13, 2023, NextEra Energy Services entered into the Agreement referenced above, pursuant to which NextEra Energy Services will acquire all of the issued and outstanding membership interest of FireSide.

6. Following the transaction, NextEra Energy Services will continue to operate FireSide in substantially the same manner as it is operated today, enhanced by NextEra's long and successful management of energy companies and best-in-class customer service and support. NextEra and its leadership are also committed to providing services to customers that achieve world-class safety and reliability metrics—a commitment that will now be extended to all FireSide customers. NextEra will utilize its vast experience across both regulated and retail markets to ensure that each customer is provided industry-leading customer service and support with an enhanced offering of products designed to meet the customer's individual needs.

7. Importantly, the team behind FireSide will remain substantially unchanged as virtually all of the FireSide staff have agreed to be retained by NextEra Energy Services after the close of the sale outlined in the Agreement. To further strengthen the existing FireSide team and

ensure a smooth transition, NextEra Energy Services' leadership team will also be engaged to apply its extensive expertise in natural gas commodity and transportation and the Georgia natural gas marketplace. NextEra Energy Services' Vice President and General Manager of Retail Natural Gas, PJ Zonsius, has over 13 years of experience working directly in the Georgia marketplace and is currently the Chair of the Natural Gas Association of Georgia. Similarly, NextEra Energy Services' Vice President of Supply and Risk Management, Michael Swartzell, has over 19 years of experience working directly in retail natural gas markets, including 17 years of experience in Georgia working for Gas South. Together Messrs. Zonsius and Swartzell bolster FireSide's offerings to ensure its commercial customers receive industry leading supply, asset optimization, rate design, and risk management support.

8. Consistent with its retention of the existing FireSide team, NextEra Energy Services has no current plans to change the organizational structure or operations of the business as a result of the Agreement and customers will not be impacted in any negative fashion. All existing customer contracts will be honored in full, appropriate notice will be provided to each customer, and the overall customer experience will be enhanced through expanded product offerings and extensive customer service resources.

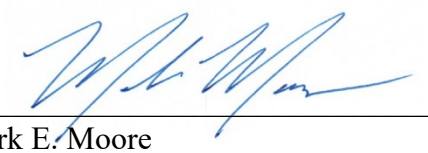
9. From a financial standpoint, FireSide will also benefit from NextEra's strong financial position. NextEra is the world's largest electric utility by market capitalization with revenues in calendar year 2022 of over $21 billion and has ample access to capital.

10. As the foregoing demonstrates, FireSide customers will see benefits from the ownership of FireSide by NextEra Energy Services based on the significant financial strength and broad expertise in the energy business of the NextEra's family of companies.

11. Commission Rule 515-7-3-.04 (10) provides that "marketers must apply to the Commission to receive authorization prior to any change in ownership, name change …. any other substantial change that would affect their certification." The proposed transaction will have no negative impact on FireSide's financial and technical capability to perform as a certificated marketer, nor will it negatively impact FireSide's ability to obtain sufficient gas supply to meet the requirements of its certificate. *See*, Commission Rule 515-7-3-.04(1). FireSide will continue to operate subject to the provisions of the Natural Gas Act and applicable Commission Rules. As discussed above, the change in ownership will also have no negative impact on FireSide's customers.

WHEREFORE, FireSide Natural Gas, LLC requests that the Commission grant this Petition at its earliest opportunity but not later than the December 19, 2023, Administrative Session and authorize the change in control and corporate structure outlined in the above Petition.

Respectfully submitted on November 20, 2023.



Mark E. Moore
Georgia State Bar No. 371083

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Attorneys for NextEra Energy Services Georgia, LLC.

BEFORE THE PUBLIC SERVICE COMMISSION

STATE OF GEORGIA

IN RE: FIRESIDE NATURAL GAS, LLC'S **APPLICATION FOR A NATURAL GAS MARKETER CERTIFICATE OF AUTHORITY**	**Docket No. 25471**

CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT I SERVED TRUE AND CORRECT COPIES OF THE FOREGOING APPLICATION AND PETITION OF FIRESIDE NATURAL GAS, LLC FOR REVIEW AND APPROVAL OF AMENDMENT TO INTERIM CERTIFICATE NO. GM-36 REFLECTING A CHANGE IN OWNERSHIP TO NEXTERA ENERGY SERVICES GEORGIA, LLC UPON ALL PARTIES LISTED BELOW VIA HAND DELIVERY AND/OR BY UNITED STATES MAIL WITH FIRST-CLASS POSTAGE AFFIXED THERETO AND ADDRESSED AS FOLLOWS:

Sallie Tanner, Executive Secretary
Georgia Public Service Commission
244 Washington Street SW
Atlanta, GA 30334
(Via Hand Delivery)

Ms. Irma Ormeno
Georgia Public Service Commission
244 Washington Street SW
Atlanta, GA 30344
(Via Hand Delivery)

This 20th day of November 2023.



Mark E. Moore
Georgia State Bar No. 371083

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