

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

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**NEXTERA ENERGY SERVICES GEORGIA, LLC'S SUPPLEMENTAL RESPONSE  
TO STAFF'S TWENTY-FIRST SET OF DATA REQUESTS TO FIRESIDE NATURAL  
GAS, LLC**

In response to the Georgia Public Service Commission Staff's Twenty-First Set of Data Requests, NextEra Energy Services Georgia, LLC ("NextEra Energy Services") as buyer and designed representative of Fireside Natural Gas, LLC ("FireSide") responds under oath as follows:

**Fireside Acquisition by NextEra Energy Services**

**NOTE:** For purposes of these data requests and responses, (1) "NextEra Energy" shall mean NextEra Energy Services Georgia, LLC, as the counterparty to that certain Membership Interest Purchase Agreement (the "Agreement"), unless otherwise indicated in the response, and (2) "Change in Ownership" shall mean the closing of the transaction contemplated under the Agreement, upon which NextEra Energy Services Georgia, LLC will acquire 100% of the membership interest in Fireside Natural Gas, LLC.

STF-21-1 Please provide the Purchase Sales Agreement between FireSide and NextEra Energy.

**RESPONSE (Provided by PJ Zonsius – Vice President and General Manager of Retail Gas, NextEra Energy Services):**

Information responsive to this request is attached as **Exhibit A** in the Trade Secret response previously filed via the Commission's alternative electronic filing procedures. This information is confidential and protected by the Georgia Trade Secrets Act of 1990 (O.C.G.A Section 10-1-760, et seq.) and is hereby filed in accordance with Commission Rule 515-3-1-.11.

STF-21-2 What is FireSide's current Management structure? Will there be any changes to FireSide's management after the Change in Ownership?

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**RESPONSE (Provided by PJ Zonsius – Vice President and General Manager of Retail Gas, NextEra Energy Services):**

FireSide's leadership team is comprised of a CEO and two Vice Presidents. Immediately following the Change in Ownership, all FireSide employees, except the sales leader, will remain in place and will be seamlessly transitioned to be employees of Gexa Energy LP. Gexa Energy LP is the NextEra Energy affiliate that employs the individuals with responsibility for retail operations. The employees being transitioned will work closely with NextEra Energy Services and their primary responsibility will be supporting their existing functional area within FireSide. FireSide's leadership team will report to Gexa Energy employee PJ Zonsius, NextEra Energy Services' Vice President and General Manager of Retail Natural Gas, who has over 13 years of experience working directly in the Georgia marketplace and is currently the Chair of the Natural Gas Association of Georgia.

STF-21-3 Will there be any changes in FireSide's finances after the Change in Ownership?

**RESPONSE (Provided by PJ Zonsius – Vice President and General Manager of Retail Gas, NextEra Energy Services):**

There are no planned changes to FireSide's finances after the Change in Ownership.

STF-21-4 After the Change of Ownership, will there be any changes in FireSide's accounting and finance staff?

**RESPONSE (Provided by PJ Zonsius – Vice President and General Manager of Retail Gas, NextEra Energy Services):**

There are no planned changes to FireSide's accounting and finance staff. Immediately following the Change in Ownership, FireSide's accounting and finance staff will remain in place and will work closely with NextEra Energy Services' leaders in each functional area. FireSide's accounting and finance staff will report to PJ Zonsius.

STF-21-5 Will there be any changes to FireSide's call center? For example, will it be merged with NextEra's or will the number of Call Service Representatives increase or decrease?

**RESPONSE (Provided by PJ Zonsius – Vice President and General Manager of Retail Gas, NextEra Energy Services):**

NextEra Energy Services plans to operate FireSide in substantially the same manner as it is operated today. FireSide's employees will continue to provide customer support for its commercial customers and there will be no change to how customers contact FireSide. These employees will become Gexa Energy LP employees with the primary responsibility of supporting NextEra Energy Services by providing the same level of customer support within the Georgia marketplace.

## PUBLIC DISCLOSURE

STF-21-6 How will FireSide's deposits for the major pipelines and AGL be provided?

**RESPONSE (Provided by PJ Zonsius – Vice President and General Manager of Retail Gas, NextEra Energy Services):**

Immediately following the Change in Ownership, all deposits will remain in place and will transfer to NextEra Energy Services as part of the Agreement.

STF-21-7 After the Change of ownership, will there be any changes to FireSide's gas operations? Will there be any gas operations staff changes?

**RESPONSE (Provided by PJ Zonsius – Vice President and General Manager of Retail Gas, NextEra Energy Services):**

NextEra Energy Services plans to operate FireSide in substantially the same manner as it is operated today. Please also see FireSide's response to STF-21-2.

STF-21-8 Please provide NextEra Energy's company financials for 2020 – 2023.

**RESPONSE (Provided by PJ Zonsius – Vice President and General Manager of Retail Gas, NextEra Energy Services):**

NextEra Energy Services' financials are not separately prepared or reported, but instead included in the financial reports of parent company NextEra Energy, Inc.<sup>1</sup> Please refer to the links below for the financial reports of the parent company.

2023 10-Q 11/7/23

[https://otp.tools.investis.com/clients/us/nextera\\_energy\\_inc/SEC/sec-show.aspx?FilingId=17034692&Cik=0000753308&Type=PDF&hasPdf=1](https://otp.tools.investis.com/clients/us/nextera_energy_inc/SEC/sec-show.aspx?FilingId=17034692&Cik=0000753308&Type=PDF&hasPdf=1)

2022 <https://www.investor.nexteraenergy.com/~media/Files/N/NEE-IR/reports-and-fillings/annual-reports/NEE%202022%20Annual%20Report.pdf>

2021 <https://www.investor.nexteraenergy.com/~media/Files/N/NEE-IR/reports-and-fillings/annual-reports/2021%20NEE%20Annual%20Report.pdf>

2020 <https://www.investor.nexteraenergy.com/~media/Files/N/NEE-IR/reports-and-fillings/annual-reports/2020%20NEE%20Annual%20Report.pdf>

STF-21-9 Will NextEra Energy agree to provide a parental guarantee for FireSide signed by a corporate officer?

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<sup>1</sup> NextEra Energy, Inc. (NYSE: NEE), as specified in the Petition, is the ultimate parent of NextEra Energy Services, LLC.

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**RESPONSE (Provided by PJ Zonsius – Vice President and General Manager of Retail Gas, NextEra Energy Services):**

If required, NextEra Energy Services will pursue a parental guarantee from its affiliate NextEra Energy Capital Holdings for an agreed amount signed by a corporate officer.

STF-21-10 FireSide's T&C's are currently limited to serve commercial customers only. Does NextEra plan on making any changes to FireSide's T's & C's after the change in ownership? For example, does the company plan on filing a petition to also serve residential customers in the future?

**RESPONSE (Provided by PJ Zonsius – Vice President and General Manager of Retail Gas, NextEra Energy Services):**

At this time, NextEra Energy Services does not have immediate plans to make any changes to FireSide's customer base. However, NextEra Energy Services reserves the right to make changes to FireSide's T's & Cs in the future in response to market or regulatory changes and for further integration with NextEra Energy Services' corporate policies and business practices. Such changes will be forward-looking and in accordance with the applicable laws, including the Commission's rules.


STF-21-11 Do FireSide and NextEra agree that FireSide, as a certificate of authority holder, must continue to meet Commission's financial and technical capabilities and adhere to all Commission rules?

**RESPONSE (Provided by PJ Zonsius – Vice President and General Manager of Retail Gas, NextEra Energy Services):**

FireSide agrees that, as a certificate of authority holder, it must continue to meet the Commission's financial and technical capabilities and adhere to all Commission rules. NextEra Energy Services similarly indicates its agreement to continue to meet the Commission's financial and technical capabilities and adhere to all Commission rules following the Change in Ownership.

**PUBLIC DISCLOSURE**

Respectfully submitted this 20<sup>th</sup> day of February 2024.

By:   
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Mark E. Moore  
Georgia State Bar No. 371083

ALSTON & BIRD LLP  
1201 West Peachtree Street  
Atlanta, Georgia 30309-3424  
(404) 881-7000  
(404) 881-7777 (*Facsimile*)  
*Attorneys for NextEra Energy Services Georgia, LLC*

**PUBLIC DISCLOSURE**

*Under penalties of perjury, I declare and affirm that the statements made in response to items STF-21-1 through STF-12-11 in the foregoing Supplemental Response to Twenty-First Data Requests, including accompanying statements and attachments are true, complete and correct. I understand that any false or misleading information within, or provided in connection with my application may be cause for denial or loss of certificate.*

PJ Zonsius  
Printed Name

Vice President and General Manager of Retail Gas  
Position

Phillip John Zonsius  
Signature Phillip John Zonsius

02/20/2024  
Date

STATE OF Virginia )  
 ) ss:  
COUNTY OF Fairfax )

**The foregoing instrument was acknowledged before me this 20<sup>th</sup> day of February 2024, by PJ Zonsius, Vice President and General Manager of Retail Gas, NextEra Energy Services Georgia, LLC, a Delaware limited liability company.**

**Witness my hand and official seal.**

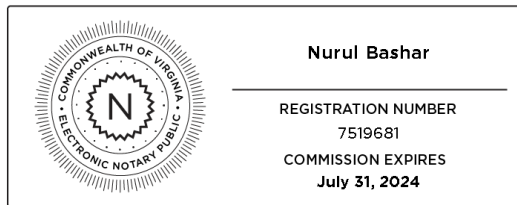
**My commission expires:** 07/31/2024.

Nurul Bashar

Nurul Bashar

Notary Public

(Notary Public)



Notarized remotely online using communication technology via Proof.

**EXHIBIT A**

**MEMBERSHIP INTEREST PURCHASE AGREEMENT**

**BEFORE THE PUBLIC SERVICE COMMISSION  
STATE OF GEORGIA**

**IN RE: FIRESIDE NATURAL GAS, LLC'S**

**APPLICATION FOR A NATURAL GAS  
MARKETER CERTIFICATE OF  
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**CERTIFICATE OF SERVICE**

I hereby certify that I have served true and correct copies of the foregoing SUPPLEMENTAL RESPONSE TO STAFF'S TWENTY-FIRST SET OF DATA REQUESTS TO FIRESIDE NATURAL GAS, LLC upon all parties listed below via electronic filing, 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

Ms. Tony Wackerly  
Georgia Public Service Commission  
244 Washington Street SW  
Atlanta, GA 30344

This 20<sup>th</sup> day of February 2024.



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Mark E. Moore  
Georgia State Bar No. 371083

ALSTON & BIRD LLP  
1201 West Peachtree Street  
Atlanta, Georgia 30309-3424  
(404) 881-7000  
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*Attorneys for NextEra Energy Services Georgia, LLC*

**PUBLIC DISCLOSURE**

**BEFORE THE PUBLIC SERVICE COMMISSION  
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**AFFIDAVIT AND BASIS FOR ASSERTION THAT REDACTED PORTIONS OF  
FILING CONSTITUTE PROTECTED TRADE SECRET MATERIAL**

NextEra Energy Services Georgia, LLC (“NextEra Energy Services”), as designated representative of Fireside Natural Gas, LLC (“FireSide”) hereby provides notice of filing certain confidential and commercially sensitive information and/or data (the “Protected Information”) with the Georgia Public Service Commission (the “Commission”) in the above-referenced docket. The Protected Information derives economic value from not being generally known and from not being readily ascertainable by proper means and is the subject of efforts by NextEra Energy Services and FireSide that are reasonable under the circumstances to maintain its secrecy. As such, and for the reasons stated below, the Protected Information constitutes trade secret information as defined by O.C.G.A. § 10-1-761(4), and is therefore protected from disclosure under Commission Rule 515-3-1-.11.

The natural gas market in Georgia is highly competitive, growing rapidly, and there are numerous marketers that offer the same services as FireSide. The Protected Information includes confidential financial data and the negotiated terms of FireSide’s acquisition by NextEra Energy Services, which are not commonly known by FireSide’s competitors, nor readily ascertainable through proper means by such competitors. In fact, to ensure the confidentiality of the Protected Information, only selected personnel have access to it. Before FireSide would grant access to the Protected Information to a party outside of FireSide, its affiliates, or its legal counsel, FireSide

## **PUBLIC DISCLOSURE**

would require the party to sign a confidentiality agreement. Indeed, it would competitively and unfairly disadvantage FireSide and NextEra Energy Services and ultimately FireSide's customers if the Protected Information became available to competitors.

More specifically, the Protected Information includes detailed descriptions of FireSide's financial revenues, including confidential income statements, balance sheets, and cash flow statements. These documents also include confidential information regarding debt, credit facilities, and customer information. Thus, disclosure of the Protected Information would give insight to competitors and third-party vendors with respect to FireSide's financial resources and/or marketing plans, as well as its future strategies regarding the natural gas market in Georgia. With such information, competitors and third-party vendors could unfairly benefit economically by implementing proactive strategies in a manner that would harm FireSide. Moreover, because the Protected Information itself has been developed through the expenditure of significant resources, to allow competitors to access it without similarly expending such resources would also grant them an unfair economic advantage to the economic detriment of FireSide and NextEra Energy Services.

For all of the foregoing reasons, FireSide has submitted the Protected Information to the Commission under protective seal with the designation "TRADE SECRET" prominently displayed on each page thereof. FireSide has also filed a "Public Disclosure" version with the designation "PUBLIC DISCLOSURE DOCUMENT" prominently displayed on each page. FireSide will maintain a master list of all filings submitted to the Commission pursuant to Commission Rule 515-3-1-.11 governing trade secrets. The master list will identify the documents submitted, the number of copies submitted, and the docket number related to FireSide's filing.

**[Verification Page to Follow]**

