STF-14-1 In the File-4 Document in **Section 5.7** pages 81 – 87, AGL discusses LNG-related peaking projects. As a separate Excel spreadsheet called **Attachment-STF-14-1**, please provide a 2025 Peaking capital budget in the following:

a. A worksheet with a detailed ledger that will include AFUDC.

b. A worksheet with a budget summary that breaks out the following:
   i. Cherokee Expansion
   ii. Cherokee Upgrades and Other Work
   iii. Macon Upgrades and Other Work
   iv. Riverdale Upgrades and Other Work
   v. Valdosta New Expansion

RESPONSE

Please see Trade Secret Attachment-STF-14-1.

Respondent: Steven Murphy
Vice President, Engineering & Construction
Southern Company Gas

STF-14-2 In the File-4 Document in **Section 5.7** pages 81 – 87, AGL discusses LNG-related peaking projects. As a separate Excel spreadsheet called **Attachment-STF-14-2**, please provide a 2026 Peaking capital budget in the following:

a. A worksheet with a detailed ledger that will include AFUDC.

b. A worksheet with a budget summary that breaks out the following:
   - ii Cherokee Expansion
   - iii Cherokee Upgrades and Other Work
   - iiii Macon Upgrades and Other Work
   - iiv Riverdale Upgrades and Other Work
   - iv Valdosta New Expansion

RESPONSE

Please see Trade Secret Attachment-STF-14-2.

Respondent: Steven Murphy
Vice President, Engineering & Construction
Southern Company Gas

STF-14-3 In the File-4 Document in **Section 5.7** pages 81 – 87, AGL discusses LNG-related peaking projects. As a separate Excel spreadsheet called **Attachment-STF-14-3**, please provide a 2027 Peaking capital budget in the following:

a. A worksheet with a detailed ledger that will include AFUDC.

b. A worksheet with a budget summary that breaks out the following:
   i. Cherokee Expansion
   ii. Cherokee Upgrades and Other Work
   iii. Macon Upgrades and Other Work
   iv. Riverdale Upgrades and Other Work
   v. Valdosta New Expansion

RESPONSE

Please Trade Secret Attachment STF-14-3.

Respondent: Steven Murphy
Vice President, Engineering & Construction
Southern Company Gas

STF-14-4 In the File-4 Document on pages, 2 and 55, AGL stated the customer growth was down. On pages 2 and 92, AGL stated that customer growth is continuing. On page 9 of the Becker direct testimony, he stated that Billing Unit growth was down. Please answer the following.

a. Please provide a separate Excel spreadsheet as **Attachment-STF-14-4**.
b. In Column-A, please provide the following customer classes.

R-1
G-10
G-11
0 to 2.5
2.5 to 7
7 to 20
20 to 200
200 to 500
500 to 3000
G-12 +3,000 Dth
AG-1
S-51

c. As a header to Columns B – E, label as 2020 – 2023.
d. Please provide the actual historic Billing Unit numbers in Columns B – E for the customer classes listed.
e. Based on the data, please show a year-over-year Billing Unit changes as a percentage.

RESPONSE

Please see Attachment STF-14-4.

Respondent: Win Blair
Manager, Rates
Southern Company Gas

STF-14-5 Related to years 2025 – 2027, please provide the following.

a. Please provide a separate Excel spreadsheet as **Attachment-STF-14-5**.
b. In Column-A, please provide the following customer classes.

R-1
G-10
G-11
0 to 2.5
2.5 to 7
7 to 20
20 to 200
200 to 500
500 to 3000
G-12 +3,000 Dth
AG-1
S-51

c. As a header to Columns B – E, label as 2024 – 2027.
d. Please provide the projected Billing Unit numbers in Columns B – E for the customer classes listed.
e. Based on the data, please show a year-over-year Billing Unit changes as a percentage.

RESPONSE

Please see Attachment STF-14-5. These estimates are based on forecast developed for the i-CDP filing and are based on multiple assumptions.

Respondent: Win Blair
Manager, Rates
Southern Company Gas

STF-14-6 Related to years 2020 – 2023, please provide the following.

i. Please provide a separate Excel spreadsheet as **Attachment-STF-14-6**.
ii. In Column-A, please provide the following customer classes.

R-1
G-10
G-11
0 to 2.5
2.5 to 7
7 to 20
20 to 200
200 to 500
500 to 3000
G-12 +3,000 Dth
AG-1
S-51

iii. As a header to Columns B – E, label as 2020 – 2023.
iv. Please provide the actual historic DDDC numbers in Columns B – E for the customer classes listed.
v. Based on the data, please show a year-over-year DDDC changes as a percentage.

RESPONSE

Please see Attachment STF-14-6. DDDC figures were not provided for AG-1 and S-51 since those customer classes are not billed on DDDC.

Respondent: Win Blair
Manager, Rates
Southern Company Gas

STF-14-7 Related to years 2024 – 2027, please provide the following.

i. Please provide a separate Excel spreadsheet as **Attachment-STF-14-7**.
ii. In Column-A, please provide the following customer classes.

R-1
G-10
G-11
0 to 2.5
2.5 to 7
7 to 20
20 to 200
200 to 500
500 to 3000
G-12 +3,000 Dth
AG-1
S-51

iii. As a header to Columns B – E, label as 2024 – 2027.
iv. Please provide the projected DDDC numbers in Columns B – E for the customer classes listed.
v. Based on the data, please show a year-over-year DDDC changes as a percentage.

RESPONSE

Please see Attachment STF-14-7. DDDC figures were not provided for AG-1 and S-51 since those customer classes are not billed on DDDC. These estimates are based on forecasts developed for the i-CDP filing and are based on multiple assumptions.

Respondent: Win Blair
Manager, Rates
Southern Company Gas

STF-14-8 Throughout the testimony of Mr. Becker, he discusses reserve margin. Likewise, in the File-4 Document, AGL stated the following:

> "That is at least 10% of AGL's projected system firm gas supply need on a Design Day. Depending on the nature of the disruption, this same situation could impact send-out from the LNG Plant, delivery from Transco to that same part of the AGL system, or both. If the entire Riverdale complex has to go offline to make emergency repairs, that would total about 18% of AGL's gas supply capability feeding into the Atlanta pool, which supports the largest population center in the state."

Please answer the following:

a. To be clear and for the record, please confirm that the company is not requesting the Commission to approve a reserve margin higher than 5 percent as part of the 2025 – 2034 i-CDP filing.

b. Please provide all dates and years when AGL reached a peak day that utilized any reserve margin in the last 30 years.

RESPONSE

a. AGL is not requesting that the Commission approve a Reserve Margin higher than 5 percent as a part of the 2025 – 2034 i-CDP. The Company intends to present in its next Capacity Supply Plan further details and a recalibrated point of view on the level of capacity that is appropriate for service to meet the needs of today's customers while underpinning a robust need for energy infrastructure across the State to support its growing economy.

b. AGL's system realizes a peak day each heating season. A peak day is the highest demand day that the system encounters in a heating season. A peak day may or may not be a Design Day. By comparison, a Design Day is a projection of the potential firm load that the system may encounter should a Local Distribution Company's operating area realize a weather event that approaches a design condition.

In the case of AGL, that would be a 10-degree average temperature for the day in the metro Atlanta area or pool. AGL's system is planned for across 9 distinct geographic areas or pool groups. Each pool has its own unique load characteristics and planning criteria for Design Day events. Some are colder than a 10-degree average temperature and some are warmer. AGL's system has not encountered such a Design Day weather in recent years.

Likewise, AGL's system has not had to rely upon its total level of gas supply capability, including the amount held as reserve margin, either. That is not to say the system does not need a reserve margin capability. Nor is it meant to say that the utility should not appropriately plan for a Design Day type weather event.

Reserve Margin is not a discrete gas supply resource embedded in the approved Array of Assets in the Company's Capacity Supply Plan proceedings. Reserve Margin is integral to the total gas supply capability of the approved Array. It is therefore impractical if not impossible to isolate and identify the use of Reserve Margin as it is not a stand-alone resource or capability within the approved Array.

Respondent: Gregory Becker
Director, Capacity Planning
Southern Company Gas

STF-14-9 On page 25, section 4.4.2 Riverdale, it is stated that "this critical plant update will eliminate the risk of expander failure and mitigate the summertime low pressure operating risks." Please elaborate on what operational issues could occur as a result of the failure to update the Riverdale LNG plant.

RESPONSE

This plant has been in operation since 1972, and certain equipment is operating beyond its designed useful life. Through careful stewardship of this resource, AGL has been able to continue its operations; however, AGL is now at the critical point where significant upgrades must be made.

Riverdale's turbo expander liquefaction system is the only source of Liquefied Natural Gas ("LNG") onsite for replenishing the inventory in Riverdale's two LNG storage tanks that naturally boils off, as well as what is used for AGL's peaking supply. Riverdale's liquefaction system is sized to produce the LNG needed to fill the working capacity of both tanks (2.5 BCF) in approximately 200 days. If the turbo expander liquefaction system is either unavailable due to equipment or components failures and/or it is not meeting its design LNG production rate, the LNG tanks may not be filled going into the winter heating season and the AGLC system will be at risk of not having adequate LNG capacity to meet its peaking demand needs.

Respondent: Gregory Becker
Director, Capacity Planning
Southern Company Gas

STF-14-10 As an Excel spreadsheet called **Attachment-STF-14-10**, in the past 20 years, please list all upgrades that have taken place at the Riverdale LNG Plant.

RESPONSE

A partial list of projects is provided in Attachment STF-14-10 that includes major projects completed during the previous 20 years. A full project list is not practical to produce because there are numerous incremental additions or replacements that occur annually, such as valve replacements, UV/IR detectors, methane detectors, etc.

Respondent: Steven Murphy
Vice President, Engineering & Construction
Southern Company Gas

STF-14-11 Regarding the Riverdale LNG plant, when did the 1972 turbo-expansion system first started to malfunction? Since when has the system been in need of an upgrade?

RESPONSE

Over the last 5 years Riverdale's turbo-expansion system has struggled with meeting its design LNG production rate and system availability due to failures. The turbo expanders had major repairs in 2019, and then again in 2023. In 2019, AGL determined that the pretreatment vessels have exceeded their original design pressure cycles and are at risk of a material failure. The liquefaction system has also not been able to reliably meet its design liquefaction rate (10,000 mcf/day) for several years, which puts that plant at risk of not being able to replenish its LNG inventory between winter heating seasons. A summary of the annual average liquefaction rates is provided below.

Year	Liquefaction Rate (mcf/day)	Days to Replace Complete RLNG Inventory (2.5 BCF)
2020	7496	333
2021	7469	335
2022	8554	292
2023	7079	353

Last year (2023), due to limited liquefaction system availability and significantly lower than design LNG production rates, Riverdale LNG had to truck in 300+ tankers to fill their tanks' inventory by the start of heating season. AGL's 2022-2031 i-CDP filing included multiple projects to replace the components of the Riverdale liquefaction system individually including the pretreatment vessels, piping and valves, cold box, turboexpander, and various other subsystems of components of the liquefaction system. Due to the continued decrease in system availability, lower than design LNG production rates, and decreasing availability of replacement parts, AGL's 2025-2034 i-CDP filing now includes a complete replacement of Riverdale LNG's liquefaction system to achieve the reliability and LNG production rates needed for the foreseeable future.

Respondent: Steven Murphy
Vice President, Engineering & Construction
Southern Company Gas

STF-14-12 Regarding the update to the Riverdale LNG plant, what will be the designed useful life of the closed refrigerant loop system?

RESPONSE

The design of the new system, combined with planned maintenance and periodic component overhauls, should have a useful life of 30+ years.

Respondent: Steven Murphy
Vice President, Engineering & Construction
Southern Company Gas

STF-14-13 Regarding the following statement on page 11 of Mr. Becker's testimony:

"Having a closed loop refrigerant capability also allows AGL to liquify gas from either SNG or Transco delivery to the system, assuming the Riverdale plant can be configured in a way to allow it. There are other benefits relating to renewable natural gas ("RNG") that also come into play.

Please answer the following:

a. When and how will AGL find out if the closed refrigerant loop system at the Riverdale LNG plant can be configured to allow AGL to liquify gas from either SNG or Transco delivery to the system?

b. What does the system being able to be configured in a way to allow for such capability depend on? Can that be known before purchasing the system or only after the purchase?

c. Please elaborate on what having that capability would mean to the Company operationally.

d. Are any of the other AGL LNG plants configured to allow for this capability?

RESPONSE

a. The new closed looped system can be designed to liquify gas from both Southern Natural Gas Pipeline ("SNG") and from Transcontinental Gas Pipe Line ("Transco").

b. The new closed loop system can be designed to liquify gas from either SNG or Transco but will operate at a higher efficiency if supplied gas from SNG, which is typically at a higher receipt pressure into AGL's system at Riverdale LNG's location. The range of supply gas pressures that the system will need to function with will be included in the specifications used to purchase the new liquefaction system.

c. The Riverdale complex is an integral part of AGL's system operations. Among other things, this portion of the system receives gas from SNG and from Transco today. The two sources of flowing gas supply operate at meaningfully different pressures and are managed by AGL as they both enter the Company's system.

The current liquefaction of gas into the Riverdale LNG facility is dependent on delivery only from SNG to utilize the turbo expander to create LNG through a controlled pressure drop process. SNG delivers gas in vapor form at AGL's Riverdale complex at a high enough pressure to utilize that unique liquefaction process; Transco does not. In moving to a closed loop refrigerant system to chill the vapor form of natural gas down to the point that it liquefies, Riverdale LNG will no longer require as high of a delivery pressure to allow the planned equipment to function and create LNG. Therefore, the liquefaction of gas supply delivered from either interstate pipeline should be possible. This creates a far more reliable operational option to refill and maintain overall LNG inventory compared to current capabilities at the Riverdale LNG facility.

d. Due to the network of pipelines connected to the Cherokee LNG plant, the Cherokee LNG plant has the capability to feed gas to its liquefaction system with gas supplied from any of AGL's suppliers, including Transco, SNG, and East Tennessee. Macon LNG's liquefaction feed gas is delivered from SNG.

Respondents: Steven Murphy
Vice President, Engineering & Construction
Southern Company Gas

Gregory Becker
Director, Capacity Planning
Southern Company Gas

STF-14-14 In the pre-filed testimony of Gregory Becker, page 6, lines 1-3, it is stated that AGL will construct an LNG facility that accepts LNG inventory delivered by truck. Where will the LNG be sourced from and is this proposed sourcing method a long-term solution?

RESPONSE

At this time, AGL plans to source trucked LNG from its existing LNG facilities to support the new peaking facility to be constructed in Valdosta. Geographically, Macon LNG is the closest location. All 3 of the Georgia peaking facilities are capable of trucking LNG volumes when and if it should be needed.

This is presently the only solution. As far as in the future, Valdosta LNG is going to be scalable, so additional storage and vaporization capability can be added to meet growing demand. See response to STF-14-22 for further discussion of this expandability.

This is AGL's appropriate gas supply solution for the need to meet peaking gas supply requirements.

Respondent: Gregory Becker
Director, Capacity Planning
Southern Company Gas

STF-14-15 In the pre-filed testimony of Gregory Becker, page 8, lines 12-15, it is stated that a conditional agreement exists between Transco and AGL based a "very rigid project timeline." What project timeline is the company referring to and will the company file a petition to seek Commission approval for these conditions to be met?

RESPONSE

The testimony cited in STF-14-15 refers to Transco's timeline for its expansion project. AGL is not required to file a petition with the Commission for any approvals related to the conditions being met and therefore does not plan to file such a petition.

Respondent: Gregory Becker
Director, Capacity Planning
Southern Company Gas

STF-14-16 In the pre-filed testimony of Gregory Becker, page 10, lines 1-4, it is stated that a turbo expander at the Riverdale liquefaction plant failed due to mechanical failure of components. Are there other natural gas liquefaction plants that use this technology? If yes, what is the current condition of the turbo expander and is it fully operational?

RESPONSE

AGL is unaware of any turbo expander systems in operation at a liquefaction plant, inside or outside of Southern Company Gas, other than that used at Riverdale. While inquiring about the availability of a replacement turbo expander system for Riverdale, it was discovered that a turbo expander system comparable in size to the existing system has not been installed in several decades. Closed loop liquefaction systems using nitrogen or a mixture of nitrogen and hydrocarbons as a refrigerant have been the predominant liquefaction system technology for the past 30+ years. It is for this reason that AGL is proposing to use a closed loop liquefaction system at Riverdale.

Respondent: Gregory Becker
Director, Capacity Planning
Southern Company Gas

STF-14-17 Page 11 of Mr. Becker's testimony line 13-15 states:
"Having a closed loop refrigerant capability also allows AGL to liquify gas from either SNG or Transco delivery to the system, assuming the Riverdale plant can be configured in a way to allow it. There are other benefits relating to renewable natural gas ("RNG") that also come into play."

Please elaborate on the benefits relating to renewable natural gas that come into play with the Riverdale plant upgrading to a closed refrigerant loop system.

RESPONSE

The other benefits relating to renewable natural gas ("RNG") that come into play with the Riverdale plan upgrade have to do with distribution system operating pressures.

Riverdale LNG typically liquefies in the summer months when natural gas usage is low. The turbo expander liquefaction system is designed to liquefy 10 million cubic feet of gas per day, but the nature of the expansion process is such that 100 million cubic feet per day must be delivered to Riverdale to liquefy 10 million cubic feet per day. The remaining 90 million cubic feet per day goes into the AGL Atlanta distribution system during these low-usage times of the year and is known as tail gas. This amount of gas entering the Atlanta pool at this time of year fills up the distributions system, making it difficult for the AGL distribution system to accept additional gas volumes from other sources. The proposed closed loop liquefaction system eliminates the tail gas issue. This proposed upgrade at Riverdale would enable RNG to be connected to AGL's Atlanta distribution system should AGL undertake an RNG project in the future.

Respondent: Gregory Becker
Director, Capacity Planning
Southern Company Gas

STF-14-18 Regarding the adding of a peak shaving facility in Valdosta, Attachment D pictured below shows the requirements of the Valdosta pool increasing exponentially from the 2023-2024 plan, to the 2032-2033 plan. On page 31 of the File-4 Document, Figure 4.5 (also pictured below), shows that for the 22-23 heating season, the load for Valdosta was under-forecasted by 1,766 Dth and the Valdosta Billing Units were under predicted by 21.5%. Besides the large interruptible customer converted to firm and the announcement of Walmart's new dairy processing facility, what other confirmed customers with firm load requirements are to be considered to justify the requirement increases for 2025-2026 and beyond??

Figure 4.5: Comparison of Forecast and Actuals for Heating Season 2022-2023

Load Dth

	Actual	Predicted	Over/(Under) Predicted
Atlanta	1,860,953	1,868,960	8,008
Augusta	67,766	89,674	21,909
Brunswick	30,710	32,034	1,323
Macon	54,104	51,342	-2,762
Rome	50,456	46,929	-3,527
Savannah	40,781	44,812	4,031
Ex-Atl SNG	24,331	23,679	-652
Ex-Atl TR	89,055	49,990	-39,065
Valdosta	8,748	6,982	-1,766
System Total	2,226,904	2,214,402	-12,501

UPBU

	Actual	Predicted	Over/(Under) Predicted
Atlanta	1.3110	1.3124	0.1%
Augusta	0.9573	1.2601	31.6%
Brunswick	1.4526	1.2953	-10.8%
Macon	1.1939	1.1167	-6.5%
Rome	1.8440	1.5381	-16.6%
Savannah	0.9022	0.9860	9.3%
Ex-Atl SNG	0.6347	0.6177	-2.7%
Ex-Atl TR	2.2350	1.2389	-44.6%
Valdosta	1.3881	1.0892	-21.5%
System Total	--	--	--

RESPONSE

There is at least one existing Firm customer in the Valdosta pool that has contacted the Company to share that they plan to double their manufacturing capacity at their current facility. The cumulative effect of that added firm load, the conversion of an interruptible customer to firm service and the added load for Wal-Mart's new dairy processing facility creates an immediate projected need for additional gas supply capability to meet projected demand in a design day weather event. Overall projected load increases in the Valdosta pool, coupled with these new known load additions made it essential to augment the pool's gas supply capability, effective immediately. AGL has done so by making plans to utilize portable LNG vaporization until a more permanent and scalable LNG peak shaving facility can be put in place.

The table shared above illustrates some calculations of the effectiveness of AGL's load forecasting around peak load conditions. The load and weather experienced in South Georgia in the 2022-23 heating season did not approach design conditions. Therefore, seeing a relatively large variation for Valdosta (small for the overall system), is not unusual. This table reflects using Design Day

regression projection formulas to calculate possible firm load coupled with actual weather on the coldest day in the 2022-2023 heating season. That was 12/23/2022. Valdosta reached a peak day HDD value of 33. Design Day HDD level for that pool is 45 HDDs. The use of a Design Day regression model is not applicable for a winter day that is so far removed from projected Design Day HDD levels. Therefore, a larger deviation from actual experienced load is expected.

Projecting that same day using a January regression model for a typical winter heating season day reflects that the firm load would have been under forecasted. This carries far more risk when it comes to providing essential services.

Respondent: Gregory Becker
Director, Capacity Planning
Southern Company Gas

STF-14-20 Regarding the peak shaving facility project in Valdosta, please elaborate on why a peaking resource is the best fit for the projected load being added to the Valdosta pool. What other options did AGL explore before settling on building their own peaking facility?

RESPONSE

AGL needs to be able to handle the needle peak of the Valdosta pool when it experiences a Design Day. The proposed LNG peaking solution included in this i-CDP filing appropriately addresses the short durational need for natural gas supply anticipated to serve projected firm load. AGL did explore other options. The first involved adding an additional feed to the Valdosta distribution system from the east. This option would have required the installation of approximately 126 miles of 12-inch steel pipe to make that additional intrastate connection. It was not selected.

AGL also contacted SNG to see if there was any immediately available transportation capacity that could be contracted for to augment the overall gas supply capability for the pool. The pipeline did not have any available and would require an expansion project to create capacity that would enable future load growth to be served.

Additionally, AGL discussed the possibility of SNG developing a commercial LNG facility in the area that could augment gas supply capability in the Valdosta area. It was determined that the project would take years to complete, be very expensive, and would need to be paired with further improvements and upgrades to their interstate transmission system to create the capacity needed to provide additional firm delivery to AGL. That option was not selected as viable.

Respondents: Gregory Becker
Director, Capacity Planning
Southern Company Gas

William Horne
Director, Resource Planning & Economic Development
Atlanta Gas Light Company

STF-14-21 Please provide AGL's preliminary detailed cost estimate for the LNG peak shaving facility.

RESPONSE

Please see Trade Secret Attachment STF-14-21.

Respondent: Steven Murphy
Vice President, Engineering & Construction
Southern Company Gas

STF-14-22 Please explain how the peaking facility in Valdosta will have the necessary equipment to increase its send-out capability and storage capability over time to meet the increasing demands as expected by AGL.

RESPONSE

The proposed Valdosta peaking facility will be designed in a modular fashion with shop-fabricated LNG storage tanks and vaporizers. The peaking facility site will be designed to facilitate the installation of additional LNG storage tanks and vaporizers when additional peaking supply is needed. Federal code requirements on LNG plant siting and the actual land parcel size and location selected for the plant will ultimately determine the scalability limits for send-out and storage capability.

Respondent: Steven Murphy
Vice President, Engineering & Construction
Southern Company Gas

STF-14-23 On page 36 of the File 4 document, AGL states in the conclusion:

"Accordingly, for the next CSP proceeding that will be filed in 2025, AGL requests that this Commission agree with AGL's load forecast as presented in this filing and approve the following in the 2025-2028 CSP: allow AGL and other stakeholders to explore readily available incremental gas supply options like making Elba Island FT available to deliver supply to the AGL system consistent with other FT in the approved Array of Interstate Assets; allow AGL and other stakeholders to explore increasing the Reserve Margin; approve the upgrade to the liquefaction equipment at Riverdale LNG as further discussed in Chapter 5, and approve construction of a scalable storage / vaporization-only LNG facility in Valdosta further discussed in Chapter 5 of this Plan."

a. Please provide a detailed explanation regarding how AGL envisions allowing stakeholders to explore readily available increment gas supply options.
b. What steps/approvals are needed to allow this?

RESPONSE

a. In addition to the i-CDP and GRAM processes, the Company plans to connect with all appropriate internal stakeholders and be engaged with the Marketer Working Group as details around incremental gas supply options are developed.

b. The Commission will be provided with all relevant supporting details for the Company's plans when it files the next Capacity Supply Plan ("CSP") covering 2025-2028.

Respondent: Gregory Becker
Director, Capacity Planning
Southern Company Gas

STF-14-24 Considering the lead time to build incremental interstate FT capacity, is the Company willing to conduct an open and/or information session with the potential new C&I customers? Please describe the process and the desired results.

RESPONSE

AGL already has business processes in place that allow the Company to plan for commercial and industrial ("C&I") customers who may establish a new natural gas service in the near future. Those discussions with potential new customers include sharing information about the availability of gas supply service in the area in which they are interested in locating. Once it is determined that adequate gas supply is available in the specified area, the process continues to establish them as a new customer. These customers may or may not formally move forward to become a customer, so this evaluation process is always evolving and is very dynamic in nature.

In instances where there is not adequate gas supply available in a specific area or to the system as a whole (relevant for some recent potential large new customers), the Company needs to develop an appropriate framework to welcome that new customer and stand ready to accommodate load of other new customers. Aggregation of many new C&I customers would not necessarily be enough added load to justify an interstate pipeline expansion project by ourselves. That is a challenge in a capacity-constrained market and will be a key element in addressing adequate amounts of gas supply capability for the system in the next Capacity Supply Plan filing.

Respondent: Gregory Becker
Director, Capacity Planning
Southern Company Gas

STF-14-25 What influence does the Company expect current market conditions to have on the incremental load? How did this expectation affect the forecast of incremental load?

RESPONSE

For purposes of this response, AGL assumes that Staff is inquiring about economic development activity in Georgia and its influence on the load forecast included in the 2025-2034 i-CDP filing.

AGL includes incremental loads in the load forecast resulting from economic development activities by the state and local entities for projects that have been finalized but does not include incremental loads associated with any pending economic development projects in the load forecast. The methods used to calculate the load forecast incorporate many inputs, two of which are associate known interruptible to firm conversions and known large commercial and industrial firm additions.

This is addressed in the testimony of Mr. Gregory Becker in the last two CSP proceedings in Docket Nos. 42317 (2019-2022 CSP) and 44319 (2022-2025 CSP).

Respondent: William Horne
Director, Resource Planning & Economic Development
Atlanta Gas Light Company

STF-14-26 On page 25 in the File-4 Document, regarding Riverdale LNG, why has the company not previously sought (prior to this application) to update the 1972 vintage turbo-expansion liquefaction system?

RESPONSE

Please see response to STF-14-11.

Respondent: Steven Murphy
Vice President, Engineering & Construction
Southern Company Gas

STF-14-27 Regarding the Liquefied Natural Gas ("LNG") units:

a. Please provide details on any changes to the operating status, including vaporization rates, capacities, and cushion gas requirements of the Company's Riverdale LNG facilities since the approval of the 2022-25 Capacity Supply Plan (Docket 44319).

b. Please provide a schedule that shows monthly volumes for LNG including inventory balance, withdrawals, boil off, and injections. The data should cover the timeframe since the approval of the last Capacity Supply Plan.

RESPONSE

a. There have been no changes to the vaporization rates, capacities, and cushion gas requirements of the Company's Riverdale LNG facilities since the approval of the 2022-2025 Capacity Supply Plan. The turbo expander liquefaction system has been unavailable periodically for unscheduled maintenance and repairs but is currently available to produce LNG.

b. See Trade Secret Attachment STF-14-27-b. The column title "Plant Operating Mode" indicates if the plant is withdrawing, boiling off, or injecting LNG into the storage tanks.

Respondent: Steven Murphy
Vice President, Engineering & Construction
Southern Company Gas

STF-14-28 On page 33 of the File-4 Document, it states the following.

> "Because of these and other potential issues, AGL, and indeed the industry in general, prefer a standard of Reserve Margin that focuses on a single contingency failure when it is just 10 degrees or colder outside and the potential impact is even greater.…"

Please provide supporting information to support this assertion, specifically "the industry in general".

RESPONSE

The Company intends to present in its next Capacity Supply Plan, further details and a recalibrated point of view on the appropriate level of capacity for service to meet the needs of today's customers while underpinning the support for a growing need for energy infrastructure across the State to foster and promote further economic development. Please see the Company's response to STF-14-8. In support of that process, AGL will continue to work with internal and external stakeholders, including the Marketer Working Group, consistent with the Commission-approved Stipulation in past Capacity Supply Plans.

AGL is aware of the AGA conducting surveys to capture best practices around LDC planning for winter loads. A common approach centers around planning using the coldest days in history (highest HDDs) or some other statistical approach centered on weather. The Reserve Margin available to the LDC's system tends to be set at a level to appropriately address the risks innate to any forecast. AGL's practice of a fixed Reserve Margin percentage and a negotiated HDD standard for a Design Day contrast with best practices.

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