Atlanta Gas Light Company
2025 - 2034 Integrated Capacity and Delivery Plan
Docket 43820
Responses to Staff's 13th Set of Data Requests

STF-13-1 In the 2022 – 2031 i-CDP filing in the File-4 Document in Table-1, twelve (12) System Reinforcement Rider ("SRR") projects were listed on page 2. These same projects are shown in the 2025 – 2034 i-CDP filing in File-4 Document page 94 in Figure 5.25.

2022 – 2031 i-CDP Filing SRR Projects

Table 1: System Reinforcement Project List

	Project	Description	Target In Service	Estimated Cost
1	Peachtree Rd.	2.4 miles x 12″ steel 0.75 miles x 12″ plastic	2022	$21.6 MM
2	McGinnis Ferry Rd	2.9 miles x 12″ steel	2022	$13.4 MM
3	Wade Green Rd Phase 2	4.3 miles x 12″ steel	2023	$15.25 MM
4	Cumming to Hall County Pipeline	28.74 miles x 16″ steel	2024	$109.4 MM
5	High Point Road to Villa Rica	7 miles x 12″ steel	2024	$28.3 MM
6	Villa Rica to Temple	5.4 miles x 12″ steel	2024	$21.5 MM
7	Temple to Bremen	6.3 miles x 12″ steel	2025	$36.5 MM
8	NW GA Line to Rome #1	3.4 miles x 16″ steel	2025	$24.0 MM
9	Cumming to McGinnis Ferry Road	12.8 miles x 24″ steel	2025	$69.7 MM
10	Ball Ground to Ellijay	31.7 miles x 12″ steel	2028	$117.2 MM
11	Camp Creek to Fulton Industrial Blvd	5 miles x 8″ steel	2029	$18.5 MM
12	Hall County Extension	11 miles x 12″ steel	2030	$53.3 MM

2025 – 2034 i-CDP Filing SRR Projects

Figure 5.25

2022 i-CDP Proposed System Reinforcement Projects				2025 i-CDP Updates	
	Project	Description	Target In Service	Updated Target In Service	Notes
1	Peachtree Rd.	2.4 miles x 12″ steel 0.75 miles x 12″ plastic	2022	Completed	Completed under the Pressure Improvement budget line
2	McGinnis Ferry Rd	2.9 miles x 12″ steel	2022	Completed	Completed
3	Wade Green Rd Phase 2	4.3 miles x 12″ steel	2023	2027	New in service date contingent on funding approval
4	Cumming to Hall County Pipeline	28.74 miles x 16″ steel	2024	2025	First phase completed in 2023. Remainder to be completed by 2025.
5	High Point Road to Villa Rica	7 miles x 12″ steel	2024	2026	New in service date contingent on funding approval
6	Villa Rica to Temple	5.4 miles x 12″ steel	2024	2029	New in service date contingent on funding approval
7	Temple to Bremen	6.3 miles x 12″ steel	2025	2031	New in service date contingent on funding approval
8	NW GA Line to Rome #1	3.4 miles x 16″ steel	2025	2033	New in service date contingent on funding approval
9	Cumming to McGinnis Ferry Road	12.8 miles x 24″ steel	2025	2028 2029	Split into two projects (Cumming to Commerce and Commerce to McGinnis)
10	Ball Ground to Ellijay	31.7 miles x 12″ steel	2028	2030	Cut down to 20 miles of 16" steel now extending from Ball Ground to Ellijay
11	Camp Creek to Fulton Industrial Blvd	5 miles x 8″ steel	2029	2030	New in service date contingent on funding approval
12	Hall County Extension	11 miles x 12″ steel	2030	2032	New in service date contingent on funding approval

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Please provide a separate Excel spreadsheet called **Attachment-STF-13-1** with the following:

a. In Column-A, please list the SRR projects 1 - 12.

b. In Column-B for 2022, please provide the dollar amounts approved in the 2022 - 2031 i-CDP SRR capital budget with a total. Label column as "2022 Approved".

c. In Column-C for 2022, please provide the actual dollar amounts spent during 2021. Label column as "2022 Actual".

d. In Column-D for 2022, please provide the variance between Columns G and F, actual minus approved. Label column as "Variance 2022 Actual minus Approved".

e. In Column-F for 2023, please provide the dollar amounts approved in the 2022 - 2031 i-CDP SRR capital budget with a total. Label column as "2023 Approved".

f. In Column-G for 2023, please provide the actual dollar amounts spent during 2021. Label column as "2023 Actual".

g. In Column-H for 2023, please provide the variance between Columns G and F, actual minus approved. Label column as "Variance 2023 Actual minus Approved".

h. For the 2022 – 2034 i-CDP, in Column-J for 2024, please provide the dollar amounts approved for these projects in the SRR capital budget.

i. In Column-L for 2025, please provide the dollar amount requested in the 2025 – 3034 i-CDP filing for the 2025 SRR capital budget.
New
j. In Column-M for 2026, please provide the dollar amount requested in the 2025 – 3034 i-CDP filing for the 2026 SRR capital budget.
k. In Column-N for 2027, please provide the dollar amount requested in the 2025 – 3034 i-CDP filing for the 2027 SRR capital budget.

RESPONSE

Please see Trade Secret Attachment STF-13-1.

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Respondent: Steven Murphy
VP, Engineering & Construction
Southern Company Gas

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STF-13-2 In the 2022 – 2031 i-CDP filing in the File-4 Document in Table-1, twelve (12) SRR projects were listed on page 2, please provide the following.

a. As a separate Excel spreadsheet called **Attachment-STF-13-2** in Column-A, please list the twelve (12) projects.

b. In Column-B, label the heading Percentage of Completion.

c. In Column-B for each project, please list the percentage of completion for each project ending December 31, 2023.

d. In Column-D, please list number of feet of pipe that was proposed in the 2022 – 2031 i-CDP.

RESPONSE

Please see Attachment STF-13-2.

Respondent: Steven Murphy
VP, Engineering & Construction
Southern Company Gas

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STF-13-3 In Table-1 below from the 2022 – 2031 i-CDP filing, it was shown that these first six projects would be in service by the end of 2024. In the 2025 – 2034 i-CDP filing, AGL has indicated that only the first two projects were completed. Please answer the following.

a. During the 2021 – 2023 period, did AGL purchase the steel pipe, and other pipe facilities, that would be needed for the construction of these SRR projects 3 - 6 and have it in storage? If so, please provide the dollar amounts purchased.

b. Pease provide a revised version of Figure 5.25 on page 94 of the 2025 – 2034 i-CDP File-4 document with the same information as provided in the cost estimates as the last column, consistent with what was provided in the 2022 – 2031 i-CDP filing.

Table 1: System Reinforcement Project List

	Project	Description	Target In Service	Estimated Cost
1	Peachtree Rd.	2.4 miles x 12" steel 0.75 miles x 12" plastic	2022	$21.6 MM
2	McGinnis Ferry Rd	2.9 miles x 12" steel	2022	$13.4 MM
3	Wade Green Rd Phase 2	4.3 miles x 12" steel	2023	$15.25 MM
4	Cumming to Hall County Pipeline	28.74 miles x 16" steel	2024	$109.4 MM
5	High Point Road to Villa Rica	7 miles x 12" steel	2024	$28.3 MM
6	Villa Rica to Temple	5.4 miles x 12" steel	2024	$21.5 MM
7	Temple to Bremen	6.3 miles x 12" steel	2025	$36.5 MM
8	NW GA Line to Rome #1	3.4 miles x 16" steel	2025	$24.0 MM
9	Cumming to McGinnis Ferry Road	12.8 miles x 24" steel	2025	$69.7 MM
10	Ball Ground to Ellijay	31.7 miles x 12" steel	2028	$117.2 MM
11	Camp Creek to Fulton Industrial Blvd	5 miles x 8" steel	2029	$18.5 MM
12	Hall County Extension	11 miles x 12" steel	2030	$53.3 MM

RESPONSE

a. AGL did purchase steel pipe during 2021-2023 for the Cumming to Hall County project that has not yet been installed and is in storage. The dollar amount of that pipe is $957,084.25.

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b. See revised version of Figure 5.25 below as requested:

AGL i-CDP Proposed System Reinforcement Projects (SRR program)							
Project	Description	2022 i-CDP Filing		2025 i-CDP Filing	Project Spend to Date ($ millions)	Notes	2025 i-CDP Filing
		Estimate ($ millions)	Planned Completion	New Planned Completion			Estimated Cost ($millions)
Wade Green Rd Phase 2	4.3 miles x 12" steel	$15.25	2023	2027	$1.30	New in service date contingent on funding approval	
Cumming to Hall County Pipeline	28.74 miles x 16" steel	$109.40	2024	2025	$107.85	First phase completed in 2023. Remainder to be completed by 2025.	
High Point Road to Villa Rica	7 miles x 12" steel	$28.30	2024	2026	$2.54	New in service date contingent on funding approval	
Villa Rica to Temple	5.4 miles x 12" steel	$21.50	2024	2029	$0.20	New in service date contingent on funding approval	
Temple to Bremen	6.3 miles x 12" steel	$36.50	2025	2031	$0.00	New in service date contingent on funding approval	
NW GA Line to Rome #1	3.4 miles x 16" steel	$24.00	2025	2033	$0.00	New in service date contingent on funding approval	
Cumming to McGinnis Ferry Road	12.8 miles x 24" steel	$69.70	2025	2028 2029	$0.83	Split into two projects (Cumming to Commerce {11.2 miles} and Commerce to McGinnis {4.2 miles})	
Ball Ground to Ellijay	31.7 miles x 12" steel	$117.20	2028	2030	$0.38	Cut down to 20 miles of 16" steel now extending from Jasper to Ellijay	
Camp Creek to Fulton Industrial Blvd	5 miles x 8" steel	$18.50	2029	2030	$0.00	New in service date contingent on funding approval	
Hall County Extension	11 miles x 12" steel	$53.30	2030	2032	$0.00	New in service date contingent on funding approval	

Respondent: Steven Murphy
VP, Engineering & Construction
Southern Company Gas

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STF-13-4 As part of the 2022– 2031 i-CDP filing in AGL Exhibit No._(MJM-1) – SRR-MFR-4 ("SRR-MFR-4"), AGL provided a SRR model. Please answer the following.

a. In the Mike Morley direct testimony, why wasn't it stated that the SRR recovery model used a divergent format from what was agreed to in the 2022 – 2031 i-CDP?

b. The SRR-MFR-4 exhibit isn't the same model format as approved in the 2022 – 2031 i-CDP, nor is it the same model provided as part of the quarterly filings for SRR reporting. This is inconsistent with the current SRR model, and it prevents comparability.

As **Attachment-STF-13-4**, please refile the SRR-MFR-1 exhibit using the same model format as used in the SRR quarterly reporting with the same worksheets and numbering showing the periods 2022 – 2027 with actual numbers for 2022 and 2023 and the appropriate estimates for 2024 – 2027.

c. As part of the Mike Morley direct testimony, there was no discussion about the dollar amount of rate base in the 2022 – 2031 i-CDP SRR that is being transferred to the GRAM model for recovery. Using **Attachment-STF-13-4**, show the dollar amount of SRR rate base estimated to be removed and transferred to the GRAM for recovery?

RESPONSE

a. The 2024 i-CDP SRR model is consistent with the 2021 i-CDP SRR model regarding the SRR revenue requirement calculation, including the revenue requirement components used to determine and calculate the SRR investment cost of service, and SRR rates by customer class necessary for the Company to recover the SRR revenue requirements from 2025 through 2027. This is discussed in section III SRR Revenue Requirement and Rate Calculation of Mr. Morley's testimony.

Regarding the change in formatting, the SRR model included with the i-CDP filing is in compliance with the minimum filing requirements of the i-CDP in that the model filed is in excel with formulas live and intact. Please refer to Docket No 42315, approved on January 28, 2021, Staff and AGL Stipulation for Approval of a Long-range Planning Process for the specific SRR minimum filing requirements.

Additionally, the 2024 i-CDP SRR model is in the same format and contains the necessary details and information used by multiple functional areas within the Company. These functional areas include, but are not limited to, regulatory reporting,

utility accounting, financial reporting, financial planning and forecasting, internal controls and project management. In general, the filed SRR model contains the same information required but in a manner that is more stream-lined and more efficient to use on a monthly basis by multiple functional areas and numerous personnel within the Company. Additionally, the Company currently maintains two SRR models – one for regulatory reporting and one for all other internal reporting including analytics, planning and forecasting and internal control certifications. The Company has found that the SRR model provided in the 2024 i-CDP allows for more efficient and easier performance of the many functions required internally.

b. See part a above. The 2025 through 2027 SRR revenue requirement has not been prepared in the requested format. Please note that the SRR model filed is in compliance with the minimum filing requirements and has the information necessary to prepare and modify the model if Staff prefers a different format.

c. See Attachment-STF-13-4. Forecasted yearend 2024 SRR investment is shown in tab "2 Rev Req," column AK.

Respondent: Michael Morley
Director, Regulatory Reporting & Strategy
Southern Company Gas

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STF-13-5 In the **Attachment-STF-13-4** in a new "Allocated Worksheet", please breakout all allocated costs related to AGSC, SCS, and another affiliate company, actual and estimated for the periods 2022 - 2027.

RESPONSE

AGL will provide this response in a supplemental filing on or before March 15, 2024.

Respondent: Michael Morley
Director, Regulatory Reporting and Strategy
Southern Company Gas