**BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION**

**STATE OF GEORGIA**

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| **In Re:**  **ATLANTA GAS LIGHT COMPANY’S 2025-2034 INTEGRATED CAPACITY AND DELIVERY PLAN**  **(i-CDP)** | **)**  **)**  **)**  **)** | **DOCKET NO. 43820** |

## **Georgia natural gas’ first SET OF DATA REQUESTS TO THE**

**ATLANTA GAS LIGHT COMPANY**

**2025 – 2034 i-CDP - GRAM**

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| TO BLAKE O’FARROW  DIRECTOR – REGULATORY  AFFAIRS  ATLANTA GAS LIGHT COMPANY  TEN PEACHTREE PLACE  ATLANTA, GA 30309 | Robert S. Highsmith, jr.  Lindsey S. WilliamsON  Holland & Knight LLP  1180 West Peachtree Street, NW  Suite 1800  Atlana, ga 30309  *Attorneys for Atlanta Gas Light Company* |
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Now comes SouthStar Energy Services LLC d/b/a Georgia Natural Gas (“GNG”) and pursuant to O.C.G.A. § 46-2-57 propounds the following interrogatories and requests for production of documents (collectively, “data requests”), to be answered under oath by Atlanta Gas Light Company, (“AGLC” or the “Company”) or its designated representatives. The Company shall file with the Executive Secretary’s Office using the Alternative E-filing instructions. Public and Trade Secret responses shall be accompanied by an electronic version in Microsoft Word® format for text documents and Excel® for spreadsheets.

Please provide responses on or before 4:00 p. m. on **April 10, 2024.**

**INSTRUCTIONS**

1. These requests shall be deemed to be continuing. The Company is obliged to change, supplement, and correct all answers to requests to conform to available information; including such information as first comes available to the Company after the answers are filed.
2. The answers provided should first restate the question asked and also identify the person(s) supplying the information.
3. All requests shall be answered fully and completely and shall be based on information that is within the knowledge, possession, control, or custody of the Company or which may be reasonably ascertained by the Company.
4. As used herein the team “document” includes, but is not limited to, the original and all copies (regardless of origin and whether or not including additional writing thereon or attached thereto) of all writings, drawings, graphs, charts, photographs, e-mails, text messages, data compilation, memoranda, reports, books, manuals, instructions, directives, records, forms, notes, letters, notices, confirmations, telephone calls, meetings or other communications, bulletins, transcripts, diaries, analyses, summaries, correspondence and enclosures, circulars, opinions, studies, investigations, questionnaires and surveys, work sheets, and all drafts, preliminary versions, alterations, modifications, revisions, changes, amendments and written comments concerning the foregoing, in whatever form, stored or contained in or on whatever medium, including computerized memory, magnetic media, or electronic format.

**Docket No. 43820**

**Georgia Natural Gas (GNG) - Data Requests**

**Supply**

GNG-1-1 Section 4.6 of the 2025-2034 i-CDP states that the “elimination of restrictive provisions around the FT capacity that AGL contracts for firm receipt at Elba Island” would “reduce the number of days that supplies like Cherokee LNG would need to be partially or fully utilized.” Please provide any analysis and/or data that shows how the removal of restrictions around FT capacity in Southeast Georgia (Brunswick and Macon pools) may help mitigate demand need and reliance on LNG peaking to serve the Atlanta pool.

GNG-1-2 As a part of the i-CDP or Capacity Supply Planning process, has AGL considered changes to its Cove Point contract and the associated retained Transco Dalton capacity to increase durational deliverability into the Atlanta pool? If so, please provide any analysis, data, and/or conclusions on the operational effectiveness of this option, including any comparisons relative to the changes proposed in Section 4.6 of 2025-2034 i-CDP.

GNG-1-3 Please provide the estimated storage capacity and deliverability of the proposed Valdosta LNG peaking facility, along with the source and total cost of the LNG, including labor, time, and fuel costs, that is expected to be trucked to this new facility and how those costs will be allocated to the system.

GNG-1-4 Please provide an update on the status of capital expenditures and improvements for the Riverdale LNG facility that were previously approved as a part of the 2022-2024 i-CDP.

GNG-1-5 As mentioned in Mr. Gregory Becker’s pre-filed direct testimony, please provide the total costs (labor, time, outside services and fuel) of trucking 323 tankers full of LNG to the Riverdale LNG and how those costs are captured and allocated to the system.

GNG-1-6 As a part of the i-CDP or Capacity Supply Planning process, please provide all plans, studies and efforts, if any, to address deliverability issues into the Atlanta pool, including, but not limited to, those identified on January 11, 2024, between the SNG north-line primary points, including the AGL Fulton-Industrial delivery point.

**Real-time Web Services**

GNG-1-7 Would AGL support amending the 2025-2034 i-CDP capital expenditure forecast to include real-time web services, if, as a result of further analysis within the current Marketer working group, the design of such an implementation could effectively mitigate any potential cyber-security risks?

GNG-1-8 Please provide the estimated average monthly cost to the average residential customer, using AGL’s estimated capital cost range of $1 million to $10 million, in the first full year after completion if the Commission were to adopt the real-time web services project to improve the customer experience and allow for online appointment scheduling?

Respectfully, submitted this 20th day of March, 2024

*/s/ Robert B. Remar*

Robert R. Remar

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BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION

STATE OF GEORGIA

IN RE: )

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ATLANTA GAS LIGHT COMPANY’S ) DOCKET NO. 43820

2025-2034 INTEGRATED CAPACITY )

AND DELIVERY PLAN )

**CERTIFICATE OF SERVICE**

This is the certify that I have this day served a copy of the foregoing ***GEORGIA NATURAL GAS’ FIRST SET OF DATA REQUESTS TO THE ATLANTA GAS LIGHT COMPANY*** upon the parties in this matter by email, unless otherwise indicated, as follows:

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This 20th day of March, 2024.

*/s/ Robert B. Remar*

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