Atlanta Gas Light Company
2022 - 2031 Integrated Capacity and Delivery Plan
Docket 43820
Responses to Staff's 14 Set of Data Requests

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
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