Staff Exhibit__(WC-5)

Atlanta Gas Light Company
2025 - 2034 Integrated Capacity and Delivery Plan
Docket 43820
Responses to Staff's 11th Set of Data Requests

STF-11-1 In AGL's 2025 – 3024 i-CDP Petition on pages 4 - 7, the Company requested certain amendments to the 2022 – 2031 i-CDP filing regarding the GRAM capital budget. Please answer the following. Does AGL agree when it petitions the Commission to approve funding detailed capital and O&M budgets, if there are changes in real world events that impact those budgets, which may include changes in the economy, inflationary pressures, employment constraints, supply chain constraints, or other events outside of the Company's control, it has an obligation to file a petition with the Commission explaining these events and request a change to its approved i-CDP capital and O&M budgets instead of making changes without Commission approval?

RESPONSE

No. As part of the i-CDP process, the Commission approves budget parameters, not the i-CDP capital and related O&M budgets. The Stipulation establishing plan governance ("Stipulation") provides that the Commission "will examine and approve parameters for capital budgets and related O&M spending associated with multi-year forecasts…."[1] The term "parameters" was agreed-upon between AGL and Staff to be used to describe what is to be examined and approved by the Commission which includes comprehensive plans to meet the needs of AGL customers.[2] These comprehensive plans include discussion of the size and scope of capital and related O&M budgets the Company believes are necessary to execute each plan, but the Commission does not approve budgets.

Further, AGL does not agree that it has an obligation to file a petition with the Commission explaining economic events outside of the Company's control unless the events cause AGL to be unable to meet customer needs or otherwise impacts the Company's ability to provide safe and reliable service within the capital and related O&M budget parameters approved in the current plan. Over the past two years of the current Plan, AGL adjusted its budgets within the confines of the Stipulation to meet its commitments to customers without need for an amendment.

Respondent: William Horne
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Atlanta Gas Light Company