Atlanta Gas Light

10 Peachtree Place NE
Atlanta, GA 30309
404 584 4000 tel

August 15, 2024

Ms. Sallie Tanner
Executive Secretary
Georgia Public Service Commission
244 Washington Street
Atlanta, Georgia 30334

RE: Docket 4167-U: Annual Environmental Response Cost Recovery Expenses

Dear Ms. Tanner:

In accordance with the requirements of Section IV, paragraph (D) of the Settlement Agreement in the above –referenced docket, enclosed please find several schedules depicting the purpose of the Environmental Response Costs incurred by Atlanta Gas Light Company ("AGLC") during the period July 1, 2023 – June 30, 2024.

We are also enclosing a brief summary of the current and projected remediation activities for the manufactured gas plant sites and an update to AGLC's tariff, Sheet 9.3, reflecting the updated Environmental Response Cost Recovery Rider rate effective October 1, 2024.

If you have any questions regarding this information, please feel free to contact me at 404-584-4263 or mmorley@southernco.com.

Respectfully,

Mike Morley
Director, Regulatory Reporting & Strategy

Enclosures

cc: All Commissioners
Nancy Tyer, Natural Gas Section
Janey Chauvet, Natural Gas Section
Tony Wackerly, Natural Gas Section
Bryan Batson, AGL
Pedro Cherry, AGL
Greg Corbett, AGL

Manufactured Gas Plant Sites
Annual Update
Period Ending June 30, 2024

Atlanta Gas Light Company (AGLC) continues to move forward with the investigation and remediation of its former manufactured gas plant (MGP) sites. During this year, AGLC incurred total expenses of $1.7 M for investigation, remediation, and associated activities. Expenses incurred for legal advice and services related to environmental regulations, pursuit of potentially responsible parties, and related activities were ~$132K. The cumulative amount for recoveries from third parties, insurance carriers, and potentially responsible parties since inception is in excess of $27.3 million. During the cost year, there were no third-party recoveries from insurance or other sources. A brief narrative of the significant activities during the year, including significant historical regulatory events, is presented below, and is followed by an overview of planned activities for the next year.

Manufactured Gas Plant Sites
Past Activities
Period July 1, 2023 – June 30, 2024

Georgia Sites

Athens

- Site construction in connection with redevelopment by the property owner Athens-Clarke County (ACC) is ongoing but primarily complete Georgia Power Company (GPC) and AGLC worked with ACC and its contractors on soil or water handling and disposal as needed.

Augusta

- In several emails in June and August, EPD provided concurrence with the revised UEC language and other responses that AGLC sent to EPD in May 2023 email as well as additional questions on the parcel designations included with the VRP CSR. The questions pertained to the proposed designations for abutting parcels of those in need of a UEC. AGLC agreed to the parcel designations suggested by EPD. The EPD has requested the revised parcel summary table and associated figures by email for their approval first, then in the form of a CSR Addendum as the final submittal.
- On February 1st, AGLC and a legal representative met with EPD to discuss their proposed UEC language and the need for long-term monitoring in the form of annual site inspections for the properties with ISS. EPD agreed with AGLC that, so long as occupants complied with the UEC, there would be no material risk, but EPD expressed concerns about potential exposures in the event future parties violate the UECs. AGLC agreed to present a letter report detailing the absence of material risk from reasonably plausible activities contravening the UECs. That letter report was submitted on June 5th.
- AGLC continued to work with JLL and local officials to identify the optimal beneficial reuse of the parcels AGL owns taking into account all relevant considerations.

Brunswick

- The 2023 annual visual site reconnaissance inspection was conducted on June 6, 2023 and the report summarizing the site inspection in June was submitted to EPD in July 2023.
- The 2023 Annual Site Visual Reconnaissance Inspection report for the annual site reconnaissance conducted in June 2023 was submitted in July 2023.
- The EPD provided its review of the 2022 and 2023 Annual Inspection and Visual Reconnaissance Reports, dated August 9, 2022 and July 26, 2023, respectively and found the documents to be satisfactory.
- The 2024 Annual Site Visual Reconnaissance Inspection was conducted in June of 2024.
- This site is shared with GPC and, per agreement, AGLC leads the ongoing monitoring efforts.

Griffin

- In an email dated November 28th, EPD provided comments on the draft UEC, which requested the additional language to include the need for long-term monitoring (annual visual site inspections) and vapor intrusion assessments upon development. AGLC responded in email on December 6th, stating that the terms of the proposed UECs should preclude the need for long-term monitoring. In response, EPD requested the language that AGLC considered to be effective, which was submitted on December 7th.
- On December 20th, EPD provided a response to AGLC's question on the need for long-term monitoring for the Griffin site, agreeing that monitoring might not be necessary for Griffin but reserved the right to require it for other sites and requesting only minimal additional language regarding vapor risk evaluation prior to change in use. AGLC responded on December 21st requesting a call or meeting in person to discuss EPD's position on the UEC language, mainly as it might relate to other sites.
- On February 1st, AGLC submitted a revised, redlined draft UEC to EPD for review. The revised language was discussed in the meeting held with EPD on February 1st, but EPD had not provided approval of that language as of June 30th.

Macon

- With the submittal of the VRP CSR, groundwater monitoring and Semiannual VRP Progress Reports have been discontinued. No site activities were conducted.
- The remaining draft UECs were submitted to EPD and the property owners concurrently for review in May 2018. No comments have been received from the EPD on those UECs to date. AGLC will re-submit those, in red line, for EPD to review once any comments have been received.
- AGLC began preparing for the remaining well abandonments by drafting the well abandonment plan and updating the Norfolk Southern (NS) Environmental Right-of-Entry (EROE) agreement.
- The Norfolk Southern Environmental Right-of-Entry agreement was finalized and executed.
- AGLC submitted the monitoring well abandonment work plan for all remaining site wells on April 25th. EPD provided their approval in a letter dated May 1st. The well abandonments were implemented on May 6th and were mostly completed on May 30th with a second mobilization to abandon wells adjacent to the Georgia Central or Norfolk Southern railroad. There are several monitoring wells that have been covered up by redevelopment activities in the northwest corner of the site, near the intersection of 6th and Mulberry Streets. AGLC intends to try and locate these using GPS coordinates and a metal detector next quarter. If located, AGLC will re-mobilize in an attempt to abandon all remaining wells. A monitoring well abandonment report will be submitted once all wells have been abandoned unless EPD requests one sooner.
- Based on a review of historical soil and groundwater data, in conjunction with additional assessments conducted under the Brownfields Program, EPD notified AGLC that it will not likely require UECs for Tax Parcels R074-0202, R081-0124, R082-0002, R082-0003, and R082-0004 (collectively, the 7th Street Assemblage), since those parcels appear to meet residential standards. EPD has not provided this information but is anticipating doing so relatively soon.

Macon 2

- No field activities or further reports are expected at this site.
- As background for non-field activities that may occur in future reporting periods, in 2005 AGLC and GPC entered into an Agreement Regarding Past Costs and Restrictive Covenants (the "2005 Agreement") with the Macon-Bibb County (MBC) and Macon Urban Development Authority (MUDA), current owners of the Macon 2 property. Among other things, the 2005 Agreement called for the utilities to clean up the property to nonresidential standards and to pay MBC compensation for limiting the property to nonresidential use. The 2005 Agreement also gave MBC rights to change the restrictions to include residential uses but only after returning to AGLC and GPC the compensation paid for the restrictions. In late September 2019, AGLC and GPC received a package of information from an attorney for MBC and MUDA indicating that they have been

actively exploring residential site development on the property. Through these communications, AGLC and GPC learned that in May 2015 MBC and MUDA submitted an application to enter the site into the VRP. The remedial plan included conducting additional investigation to determine the extent of any further corrective action that might be needed to certify site soils to residential standards. EPD accepted the site into the VRP in 2015 and investigation and excavation activities were conducted from 2014 to 2018. A VRP CSR was submitted in November 2018, with an amendment in April 2019. In May 2019, MUDA executed a new Uniform Environmental Covenant ("UEC") that conflicted with the restrictions required by the 2005 Agreement by allowing for some residential use and listing only MBC and MUDA as "Interested Parties" while excluding AGLC and GPC. The UEC also failed to bring the existing restrictions to the attention of EPD. After notifying MBC and MUDA of these concerns, AGLC and GPC made an extensive review of the 2005 Agreement and all relevant correspondence from 2014 to date in order to develop a possible approach that would honor the 2005 Agreement while allowing MBC and MUDA to achieve their redevelopment goals. In January 2022, AGLC and GPC provided a draft term sheet to MUDA for an agreement that would replace the 2005 Agreement. On February 10, 2022, MUDA's board approved the parameters of the proposed term sheet. Therefore, all parties appear to be ready to proceed towards negotiating a definitive agreement; however, MBC and MUDA have delayed further efforts pending commitments from private development partners

Rome

- *(Background)* The Rome MGP site was delisted from Georgia's Hazardous Site Inventory (HSI) and reclassified as a Class III site in an EPD letter dated August 10, 2015.
- On August 16, 2023, the annual site inspection was conducted, with the Annual Visual Site Reconnaissance Survey Report submitted on -September 28, 2023 in accordance with the Continuing Action Monitoring Plan (CAMP).
- On January 24th, EPD provided its review of the 2021, 2022, and 2023 Annual CAMP Inspection Reports, dated September 25, 2021, October 14, 2022, and September 28, 2023, respectively, for the above-referenced site and found the documents to be satisfactory.
- The January 24th letter also included EPD's comments on the letter report titled *Elevation Survey of the Oostanaula River Bottom*, dated December 3, 2021. Following review of that document, combined with their review of historical Oostanaula River survey data including the years 2001, 2008, 2011, 2016, and 2021, EPD agreed that the sediment cover and armor stone over SVOC-impacted sediment at the river bottom are sufficient and in accordance with the EPD-approved Long-Term Operations, Monitoring, and Maintenance Plan for Sediments in the Oostanaula River (Appendix C of 2014 VRP CSR Addendum). Accordingly, EPD will not require further action on the Oostanaula River.

Savannah

- *(Background)*AGLC completed the remediation of soil impacts with site restoration occurring in May 2005. Closure Reports were approved in June 2006 with a certain portion of the site with impacts remaining in places designated as a Type 5 (engineering controls) area, remaining on Georgia's HSI in perpetuity.
- Quarterly system effluent sampling and flow meter readings continued in July 2022 through June 2023.
- The results of the quarterly effluent sample collected in June 2023 and flow meter readings were submitted in a Quarterly Discharge Monitoring Report (DMR) on July 15, 2023.
- The Annual Site Visual Reconnaissance Report was submitted on July 15, 2023, which also included a copy of the October 2022, January, April, and July 2023 (quarterly) DMRs.
- Quarterly effluent sampling covering the period July through September of 2023 was conducted in early September 2023. Errors with the telemetry system connectivity were repaired during the September quarterly site visit.
- Quarterly effluent sampling covering the period October through December of 2023 was conducted in mid-December 2023. The results of this sampling and flow meter readings were submitted in a

Quarterly DMR on January 15, 2024, which included the proof of the flow meter calibration for the second half of calendar year 2023.

- Quarterly effluent sampling covering the period January through March of 2024 was conducted in mid-March 2023. The results of this sampling and flow meter readings were submitted in a Quarterly DMR on April 15, 2024.
- On April 1st, AGLC received an email from the City of Savannah Water Reclamation Department that stated they will require that the effluent samples be analyzed for cyanide and total phosphorus starting in May 2024. Therefore, these analyses were added to the June 2024 sampling event and will be included in future effluent sampling events.
- Quarterly effluent sampling covering the period April through June of 2024 was conducted in early June 2024. The flow meter calibration was also conducted in June 2024.
- The annual site visual reconnaissance inspection was also conducted in June, according to CAMP requirements.

Valdosta

- As the site has been delisted, the UEC has been recorded, and long-term monitoring is not required, no activities are anticipated for this period.

Waycross

- MNA continued as the groundwater remediation technology for alluvial groundwater, with reduced frequency of sampling of site COI and MNA parameters from semiannually to annually beginning with the March 2021 event.
- The annual groundwater monitoring event was conducted in mid-March and the report was submitted on May 31, 2024. AGLC reiterated the request for site closure and delisting because the March 2024 and previous groundwater monitoring events indicate that intrinsic biodegradation of organic MGP residuals in groundwater has been effective (with enhancements) to meet applicable RRSs.
- In a letter dated June 26th, 2024, EPD provided their comments on the 2022, 2023, and 2024 Annual Groundwater Monitoring Reports and request for site closure. EPD requested or concurred with the following:
    - Agreed that monitoring well MW-11 could be abandoned due to damage,
    - Requested non-substantive edits to the report and future reports, and
    - Indicated that, in order to approve the request for removal of the site from the HSI, AGLC must submit of a final CSR for the site. The CSR should include RRS compliance certifications for groundwater and soil that have not already been received and approved by EPD along with copies of EPD letters of concurrence with previous compliance certifications.

Florida Sites

Orlando

OU1:

- Continued operation of the remediation system and remediation system related sampling and operation and maintenance (O&M) in accordance with the Short-Term Groundwater Monitoring Plan and approved proposed modifications to the groundwater performance monitoring program included in Table 25 of the *October 2023 Semi-Annual Report (Year 3 Month 7-12 Reporting Period)* submitted to the United States Environmental Protection Agency (USEPA) and Florida Department of Environmental Protection (FDEP) on October 24, 2023. In May, the Group and Geosyntec implemented the proposed modifications to the groundwater performance monitoring program in the *April 2024 Semi-Annual Report (Year 4 Month 1-6 Reporting Period)* to reduce frequency of SVE system soil vapor sampling from monthly to quarterly based upon the low mass recovery.

- Quarterly sampling was performed.
- The air sparge system (primary site groundwater remediation technology for impacts outside the barrier wall) continued operations on a cycled basis. The SVE system continued operations.
- Geosyntec conducted the Year 3 Month 7 semiannual groundwater performance monitoring event and the *OU1 Semi-Annual Report for Year 3 Months 7 through 12* was submitted to USEPA on October 24, 2023.
- The Group and Geosyntec conducted the Year 4, Month 6 semiannual groundwater performance monitoring event, including the collection of dissolved oxygen and groundwater level measurements. The *Y4, Month 1-6 Semi-Annual Performance Monitoring Report* was submitted on April 29th.
- In an email dated June 24, 2024, EPA stated that they concurred with the findings of the *Semi-Annual Report (Year 4 Month 1 – 6 Reporting Period)* dated April 2024 that the treatment systems are operating as intended and soil gas and groundwater concentrations are being reduced at the site. EPA also agreed that the SVE system sampling intervals can be decreased from monthly to quarterly based upon the low mass recovery to date.
- The Annual Financial Assurance Packages were prepared and submitted to USEPA.

OU2:

- Geosyntec completed field activities for the OU2 Push-Pull flushing study, as described in the Phase 2 Pilot Study Work Plan (PSWP) in May.
- The Group completed installation of Upper Floridian Aquifer (UFA) monitoring well locations UF-MW-30 and UF-MW-31 on State-owned property and MW-33 on City of Orlando property. Following installation, aquifer characterization was performed, per the PSWP.
- Geosyntec continued recalibrating and refining the existing groundwater flow model based upon the data collected in 2020, 2021, and 2022.
- On August 3, 2023, the Group, Geosyntec, USEPA, and FDEP participated in a teleconference call to update USEPA and FDEP and to present the revised groundwater flow model for OU2 and to discuss various FS-related topics including:
    - key components of the Conceptual Site Model;
    - identification of area(s) of attainment for remedial evaluation;
    - appropriate approaches for estimating remediation performance for various remediation scenarios; and
    - the criteria that USEPA and FDEP will accept for transitioning from an active remediation technology to a passive option, such as monitored natural attenuation.
- On August 13, 2023, the Group submitted an application for an easement to secure continued access to UF-MW-30 and UF-MW-31 following the conclusion of the 1-year license agreement.
- On August 23, 2023, a second teleconference was held with USEPA, FDEP and Group representatives. The purpose of the call was for USEPA to discuss and share expectations on remedial alternatives to be evaluated in the upcoming Feasibility Study report. The USEPA provided direction to the Group with respect to using specific concentration targets for active remediation. Specifically, USEPA indicated that target areas for active remedial evaluation should include those areas of the UFA with benzene concentrations greater than 500 micrograms per liter (µg/L) and/or greater than 350 µg/L. Additionally, USEPA requested that the Group include "active" remedial technologies such as bio-augmentation and/or *in-situ* chemical oxidation for evaluation in the FS.
- On October 13th, the Group submitted the *Push-Pull Flushing Study Report* to the USEPA and FDEP. This report provided the data and results for work conducted during 2022-2023 in accordance with Section 3 of the *OU2 Phase 2 Pilot Study Work Plan* (dated 19 October 2021).
- The Group and Geosyntec conducted a comprehensive round of groundwater sampling and synoptic water level measurements of the existing network of UFA monitoring wells in November 2023. The annual report documenting the results was submitted to USEPA and FDEP on March 21st. The November 2023 groundwater data were used to inform the FS report and to construct a 3-dimensional groundwater plume model to refine and update the Conceptual Site Model (CSM).

- The Group and Geosyntec submitted a technical memo (2023 Groundwater Flow Model Enhancements and Calibration) describing a steady-state groundwater flow model for the site to USEPA and FDEP on December 15, 2023.
- The Group met with FDEP and USEPA on February 12th to discuss the OU2 conceptual site model, Feasibility Study elements, including the Remedial Action Objectives and Preliminary Remediation Goals, and alternatives for evaluation. Additionally, the Group and Geosyntec discussed and presented briefly the groundwater flow model simulations for various conceptual groundwater extraction layouts to USEPA and FDEP during the February 12th meeting. The meeting presentation and meeting notes were circulated to all meeting attendees on February 20, 2024.
- In early March, the Group received correspondence from USEPA indicating that that they had no comments or recommendations following their reviews of both the groundwater flow model technical memorandum and the Multi-Cycle Push-Pull Flushing Study, as was previously requested by the Group. The findings and analyses from these reports were used in the FS report for OU2, which was submitted to USEPA and FDEP on June 21st.
- The easement for continued access to UF-MW-30 and UF-MW-31 following the conclusion of the 1-year license agreement with the State of Florida (Bureau of Public Lands, FDEP) was executed and recorded on May 7th.

St. Augustine

- The annual groundwater monitoring event was conducted in late December and the annual groundwater monitoring report was submitted in late March 2024.
- In order to prepare for site development, monitoring well MW-30S was abandoned in early September since it could not be rehabilitated. A replacement well is not currently planned.
- AGLC and its consultants held a conference call with the new property owner, developer, and City to discuss the implications of the remediation on development activities. As it was determined that soil management oversight by AGLC is warranted to protect AGLC's interests in managing MGP-impacted soils appropriately, AGLC prepared a draft Soil Environmental Management Plan (SEMP). This SEMP was reviewed by the City and developer and was finalized prior to mobilization.
- The development of the marina site was initiated in early March 2024.
- AGLC continued to work with the owner and City to provide assistance with the soil management oversight during site development, as needed.

Sanford

- The sitewide groundwater monitoring event and annual site inspection was conducted in August 2023 and the annual groundwater monitoring report was submitted in December 2023.
- The USEPA conducted a five-year review for the Site in late March 2024.
- The annual groundwater monitoring event was conducted in May 2024.
- The Annual Financial Assurance Packages were prepared and submitted to EPA.

Manufactured Gas Plant Sites
Planned Activities
Period July 1, 2024 - June 30, 2025

Georgia Sites

Athens

- GPC and AGLC will continue to work with ACC and their contractors on soil handling and disposal until the construction excavation is complete.

Augusta

- The VRP CSR documenting that soil and groundwater meets the provisions of the VRP Act was submitted in June 2021, which included a request for closure and delisting. AGLC will respond to EPD's comments on the VRP CSR, as received, and will continue to work toward site closure.
- AGLC will continue to draft the Type 5 marker language and draft UECs for all of the affected parcels.
- AGLC will continue to work with JLL and local officials to identify parties interested in the developing the parcels.

Brunswick

- The Annual Visual Site Reconnaissance Inspection Report summarizing the June 2024 site inspection will be submitted to EPD in July 2024.
- The next annual site visual reconnaissance survey will be conducted in accordance with the CAMP in June 2025.

Griffin

- With the submittal of the VRP CSR, groundwater monitoring and Semiannual VRP Progress Reports have been discontinued.
- The chlorinated treatment system to address non-MGP-related impacts remains decommissioned. These impacts are likely associated with a dry cleaner (or cleaners) that formerly operated upgradient.
- AGLC will respond to comments provided by EPD on the VRP CSR, if any are received.

Macon

- With the submittal of the VRP CSR, groundwater monitoring and Semiannual VRP Progress Reports have been discontinued.
- AGLC will prepare draft UECs for the additional parcels identified in their June 4, 2022 Comment/Approval letter, respond to EPD's comments on the remaining UECs, if any, and will continue to work toward site closure.

Macon 2

- No field activities or further reports are expected at this site.
- No activities are planned to be conducted this quarter.
- AGLC and GPC will continue to work with MBC and MUDA to coordinate revisions to the UEC and existing covenant (if required), or toward obtaining a binding agreement to replace the 2005 Agreement Regarding Past Costs and Restrictive Covenants with the City of Macon until an agreement with all parties is reached.

Rome

- In August 2024, an annual visual site reconnaissance survey will be conducted in accordance with the CAMP and the report will be submitted in September 2024.

Savannah

- The groundwater interceptor system will continue to operate, including the quarterly effluent sampling and DMR submittals, until further notice from EPD.
- Quarterly system effluent sampling and flow meter readings will continue in this period.
- The results of the quarterly effluent sample covering the period April to June 2024 (June sampling) and flow meter readings collected in June 2024 will be submitted in a Quarterly DMR by July 15, 2024. Semiannual flow meter calibration was also conducted in June 2024. The proof of calibration will be submitted with the Quarterly DMR on July 15, 2024.
- The 2024 Annual Survey Report with the annual certification of the property uses (Type 4 and Type 5 areas), CAMP monitoring form, and site photos will be submitted to the EPD by July 15, 2024. The Survey Report will also include copies of the October 2023, January 2024, April 2024, and July 2024 (quarterly) DMRs.
- The results of quarterly effluent samples covering the periods July to September 2024, October to December 2024, January to March 2025, and April to June 2025 and associated flow meter readings will be submitted in Quarterly DMRs by October 15, 2024, January 15, April 15, and July 15, 2025, respectively.
- Semiannual flow meter calibration and system repairs (as needed) will be conducted in the second half of 2024 and the first half of 2025; the calibrations are to be performed no later than the end of the months of June and December. The proof of calibration will be submitted no later than July 15th and January 15th, respectively.
- After an evaluation of site current and historical groundwater elevation data, AGLC concluded that the system does not need to be restored to full operation status (i.e., pumping wells and system repaired and operational) to be effective. In addition, since the effluent data has been below detection limits for over 10 years, AGLC is contemplating AGLC is contemplating closure options, which may include entering the site into the VRP.
- Since the groundwater pumping wells are not required to maintain groundwater levels below the groundwater interceptor wall and the system cannot be returned to full operational status (without great expense or effort), AGLC may decommission the pumping wells and remove all electrical wiring feeding into the vault and surface materials (and potentially the entire vault) in 2025.
- AGLC will continue to coordinate with GPC site workers that need to enter the areas with a groundwater restriction.

Valdosta

- No activities are planned.

Waycross

- MNA will continue as the selected groundwater remediation technology with annual sampling in March, followed by reporting activities in May.
- AGLC will meet with EPD in August 2024 on the CSR format/requirements and begin preparation of the CSR.
- If additional groundwater monitoring is required, the results of the annual groundwater monitoring event will be summarized in a report to be submitted by May 31, 2025, if closure is not granted prior to March 2025.

Florida Sites

Orlando

- Groundwater treatment systems in OU1 will be operated and monitored and operating parameters will be adjusted as needed.
- The Group will support USEPA's Five-Year Review of OU1, which USEPA has said it intends to complete by September 2024.

- The Group will support USEPA's review of the OU2 Feasibility Study and remedy selection process through the preparation of a Record of Decision and Consent Decree.

St. Augustine

- Annual groundwater sampling and reporting will continue.
- AGLC will continue to collaborate with the new property owner/developer to the extent continued development activities have implications for the remedy.
- The Group will work with USEPA and FDEP towards a no further action agreement for groundwater at the site. AGLC and the City will be responsible for continuing obligations associated with maintenance of the institutional controls.

Sanford

- The Annual Groundwater Monitoring Report documenting the May 2024 groundwater monitoring event will be drafted and submitted to the USEPA.
- The Group will conduct the annual groundwater monitoring event and site inspection in May 2025.

Atlanta Gas Light Company
Calculation of Net Environmental Response Costs
To Be Recovered October 1, 2024 Through September 30, 2025

	Cost Year 29 7/19-6/20	Cost Year 30 7/20-6/21	Cost Year 31 7/21-6/22	Cost Year 32 7/22-6/23	Cost Year 33 7/23-6/24	Total
Total Costs	$7,349,680.32	$1,379,006.53	$1,131,021.25	$1,187,466.94	$1,746,477.49	
Amortization Period	5 Years	5 Years	5 Years	5 Years	5 Years	
Recovery Year	5	4	3	2	1	
Amount to be recovered 10/1/24 through 9/30/25 Before Deferred Tax Benefit	1,469,936.06	275,801.31	226,204.25	237,493.39	349,295.50	2,558,730.51
Deferred Tax Benefit (See Schedule 2)	(26,504.14)	(9,945.84)	(12,235.94)	(17,128.79)	(31,490.40)	(97,305.11)
Net Environmental Response Costs Amortization October 1, 2024 through September 30, 2025	1,443,431.92	265,855.47	213,968.31	220,364.60	317,805.10	2,461,425.40

Less:	Third Party Recoveries (See Schedule 5)	0.00
	Carrying Costs Accrued on Ratepayer Portion of Third Party Recoveries (See Schedule 5)	0.00
	Environmental Response Cost Balancing Adjustment (See Schedule 3)	60,880.74
	Carrying Costs Accrued on Environmental Response Cost Balancing Adjustment Twelve Months Ended 9/30/24 (See Schedule 3)	3,191.47
Amount Subject to Recovery from Ratepayers October 1, 2024 through September 30, 2025		2,397,353.19
Total Estimated Dedicated Design Day Capacity (DDDC) in Dts		2,838,928
ERC Factor per Dt of DDDC Each Year		0.84
ERC Factor per Dt of DDDC Each Month		0.0700

Atlanta Gas Light Company
Costs Incurred from July 1, 2023 through June 30, 2024

Schedule 1

Account Number	Description		Amount
18230928	Program Management Clean-Up Expense	$	746,896.97
18230929	Contractor Expense	$	157,286.70
18230930	Consultant Expense	$	710,107.00
18230931	Legal Litigation Expense	$	132,186.82
18230932	Legal Expense	$	-
18230933	Property Acquisition Settlement Expense	$	-
	Total Environmental Response Costs	$	1,746,477.49

Schedule 2

Atlanta Gas Light Company
Calculation of Deferred Tax Benefit
To Be Returned to Ratepayers

	Cost Year 29 7/19-6/20	Cost Year 30 7/20-6/21	Cost Year 31 7/21-6/22	Cost Year 32 7/22-6/23	Cost Year 33 7/23-6/24
Total Costs	7,349,680.32	1,379,006.53	1,131,021.25	1,187,466.94	1,746,477.49
X [(5-0)/ 5]					100%
X [(5-1)/ 5]				80%	
X [(5-2)/ 5]			60%		
X [(5-3)/ 5]		40%			
X [(5-4)/ 5]	20%				
	1,469,936.06	551,602.61	678,612.75	949,973.55	1,746,477.49
X Net Capital Cost Rate (Docket No. 42315-U Weighted After-Tax Cost of Capital)	7.20%	7.20%	7.20%	7.20%	7.20%
	105,847.20	39,719.82	48,865.57	68,405.72	125,760.40
X Effective Federal and State Income Tax Rate (See Below)	25.04%	25.04%	25.04%	25.04%	25.04%
Deferred Tax Benefit for Cost Year 28, Recovery Year 5	26,504.14				
Deferred Tax Benefit for Cost Year 29, Recovery Year 4		9,945.84			
Deferred Tax Benefit for Cost Year 30, Recovery Year 3			12,235.94		
Deferred Tax Benefit for Cost Year 31, Recovery Year 2				17,128.79	
Deferred Tax Benefit for Cost Year 32, Recovery Year 1					31,490.40
Federal Income Tax Rate [.21% X(1-.05114)]	19.93%	19.93%	19.93%	19.93%	19.93%
State Income Tax Rate	5.11%	5.11%	5.11%	5.11%	5.11%
Total Effective Federal & State Income Tax Rate	25.04%	25.04%	25.04%	25.04%	25.04%

Schedule 2

Atlanta Gas Light Company
Calculation of Deferred Tax Benefit
To Be Returned to Ratepayers

	Cost Year 28 7/18-6/19	Cost Year 29 7/19-6/20	Cost Year 30 7/20-6/21	Cost Year 31 7/21-6/22	Cost Year 32 7/22-6/23	
Total Costs	20,455,140.72	7,349,680.32	1,379,006.53	1,131,021.25	1,187,466.94	
X [(5-0)/ 5]					100%	
X [(5-1)/ 5]				80%		
X [(5-2)/ 5]			60%			
X [(5-3)/ 5]		40%				
X [(5-4)/ 5]	20%					
	4,091,028.14	2,939,872.13	827,403.92	904,817.00	1,187,466.94	
Amounts Oct. - Dec 2023						
X Net Capital Cost Rate	6.98%	6.98%	6.98%	6.98%	6.98%	
(Docket No. 42315-U Weighted After-Tax Cost of Capital)						
	285,615.13	205,247.17	57,765.20	63,169.80	82,903.00	
X Effective Federal and State Income Tax Rate (See Below)	25.30%	25.30%	25.30%	25.30%	25.30%	
Deferred Tax Benefit for Cost Year 27, Recovery Year 5	18,065.16					
Deferred Tax Benefit for Cost Year 28, Recovery Year 4		12,981.88				
Deferred Tax Benefit for Cost Year 29, Recovery Year 3			3,653.65			
Deferred Tax Benefit for Cost Year 30, Recovery Year 2				3,995.49		
Deferred Tax Benefit for Cost Year 31, Recovery Year 1					5,243.62	
Amount Oct. 23-Dec.23					43,939.80	
					14,647	Monthly Amount for Oct. - Dec .23
Federal Income Tax Rate [.21% X(1-.0544)]	19.86%	19.86%	19.86%	19.86%	19.86%	
State Income Tax Rate	5.44%	5.44%	5.44%	5.44%	5.44%	
Total Effective Federal & State Income Tax Rate	25.30%	25.30%	25.30%	25.30%	25.30%	
Amounts January 2024 to Present						
X Net Capital Cost Rate	7.201%	7.20%	7.20%	7.20%	7.20%	
(Docket No. 42315 Weighted After-Tax Cost of Capital)						
	294,586.88	211,694.40	59,579.73	65,154.09	85,507.15	
X Effective Federal and State Income Tax Rate (See Below)	25.04%	25.04%	25.04%	25.04%	25.04%	
Deferred Tax Benefit for Cost Year 27, Recovery Year 5	55,323.42					
Deferred Tax Benefit for Cost Year 28, Recovery Year 4		39,756.21				
Deferred Tax Benefit for Cost Year 29, Recovery Year 3			11,189.07			
Deferred Tax Benefit for Cost Year 30, Recovery Year 2				12,235.94		
Deferred Tax Benefit for Cost Year 31, Recovery Year 1					16,058.24	
Amount Jan. 24 - Sep. 24					134,562.88	
					14,951	Monthly Amount for Jan.-Sept 24
Federal Income Tax Rate [.21% X(1-.05114)]	19.93%	19.93%	19.93%	19.93%	19.93%	
State Income Tax Rate	5.11%	5.11%	5.11%	5.11%	5.11%	
Total Effective Federal & State Income Tax Rate	25.04%	25.04%	25.04%	25.04%	25.04%	

Revised Tax Benefit Calculation	
Prior Year Filing - Before Cost of Capital Change	175,759.18
Prior Year Filing - After Cost of Capital Change	178,502.68
Adjustment to Prior Year Tax Benefit Calculation	(2,743.50)
Monthly from Jan. 2024 through Sept. 2024	(304.83)

Schedule 3

Atlanta Gas Light Company
Calculation of Carrying Costs
on Balancing Adjustment
Environmental Response Cost
October 2023 - September 2024

Month	Monthly Amortization	Monthly Revenue	Monthly Balancing Adjustment (162-065 - 0000)	Cumulative Balancing Adjustment	Average Monthly Balance	Carrying Costs *	Cumulative Carrying Costs
Balance as reported ***** from previous year	297,005,871.74	297,525,701.58		(19,410.03)			476.53
Adjustment	0.00	(8,453.55)		8,453.55			94.84
Balance adjusted to actual **	297,005,871.74	297,517,248.03		(10,956.48)			571.37
Amount Applied***			16,940.90	5,984.42		(785.85)	(214.48)
October	509,045.74	499,118.77	9,926.97	15,911.39	2,477.46	19.30	(195.18)
November	509,045.74	508,972.97	72.77	15,984.16	15,947.77	124.21	(70.97)
December	509,045.74	518,020.55	(8,974.81)	7,009.35	11,496.75	89.54	18.57
January 2024	508,740.91	523,239.83	(14,498.92)	(7,489.57)	(240.11)	(1.92)	16.65
February	508,740.91	524,600.85	(15,859.94)	(23,349.52)	(15,419.55)	(123.44)	(106.79)
March	508,740.91	524,793.90	(16,052.99)	(39,402.51)	(31,376.01)	(251.18)	(357.97)
April	508,740.91	523,849.45	(15,108.54)	(54,511.05)	(46,956.78)	(375.91)	(733.88)
May	508,740.91	517,420.54	(8,679.63)	(63,190.69)	(58,850.87)	(471.12)	(1,205.00)
June	508,740.91	508,163.42	577.49	(62,613.20)	(62,901.94)	(503.55)	(1,708.55)
July ****	508,740.91	508,163.42	577.49	(62,035.71)	(62,324.46)	(498.93)	(2,207.48)
August ****	508,740.91	508,163.42	577.49	(61,458.23)	(61,746.97)	(494.31)	(2,701.79)
September ****	508,740.91	508,163.42	577.49	(60,880.74)	(61,169.48)	(489.68)	(3,191.47)
TOTAL	$303,111,677.12	$303,689,918.57		($60,880.74)			($3,191.47)

* After tax cost of capital - 6.9815% and revenue expansion factor - .747 from October 2023 to December 2023.
After tax cost of capital - 7.201% and revenue expansion factor - .7496 from January 2024 to present

** Schedule 4 shows adjustment to prior year's carrying costs.

*** Amount applied in previous year's filing.

**** Estimated Revenues

***** Reflects Corrected Carrying Costs Rates Applied for 2022 and 2023 Annual Filings

Balance Reported Prior Year	(16,940.90)	785.85
Difference Due to Corrected Carrying Costs Rates Applied in ADIT and Carrying Cost	(2,469.13)	(309.32)

Schedule 4

Atlanta Gas Light Company
Calculation of Carrying Costs
on Balancing Adjustment
Environmental Response Cost
October 2022 - September 2023

Month	Monthly Amortization	Monthly Revenue	Monthly Balancing Adjustment (162-065 - 0000)	Cumulative Balancing Adjustment	Average Monthly Balance	Carrying Costs *	Cumulative Carrying Costs
Balance as reported from previous year	290,653,582.79	291,156,517.51		(13,484.73)			2,499.33
Adjustment	0.00	(35,951.12)		35,951.12			419.76
Balance adjusted to actual ***	290,653,582.79	291,120,566.39		22,466.39			2,919.09
Amount Applied**			10,969.82	33,436.21		(2,572.70)	346.39
October	529,065.74	517,948.59	11,117.15	44,553.36	33,509.88	265.47	611.86
November	529,065.74	529,774.08	(708.34)	43,845.02	44,199.19	350.15	962.01
December	529,065.74	539,273.47	(10,207.73)	33,637.29	38,741.16	306.91	1,268.92
January 2023	529,454.63	542,021.47	(12,566.84)	21,070.45	27,353.87	213.04	1,481.96
February	529,454.63	544,384.16	(14,929.53)	6,140.93	13,605.69	105.97	1,587.93
March	529,454.63	543,836.71	(14,382.08)	(8,241.15)	(1,050.11)	(8.18)	1,579.75
April	529,454.63	543,545.81	(14,091.18)	(22,332.33)	(15,286.74)	(119.06)	1,460.69
May	529,454.63	537,672.70	(8,218.07)	(30,550.40)	(26,441.37)	(205.94)	1,254.75
June	529,454.63	526,669.55	2,785.08	(27,765.32)	(29,157.86)	(227.09)	1,027.66
July	529,454.63	524,322.41	5,132.22	(22,633.10)	(25,199.21)	(196.26)	831.40
August	529,454.63	523,412.90	6,041.73	(16,591.37)	(19,612.23)	(152.75)	678.65
September	529,454.68	523,819.79	5,634.89	(10,956.48)	(13,773.92)	(107.28)	571.37
TOTAL	$297,005,871.74	$297,517,248.03		($10,956.48)			$571.37

* After tax cost of capital - 7.1013% and revenue expansion factor - .747 from October 2022 to December 2022.
After tax cost of capital - 6.9815% and revenue expansion factor - .747 from January 2023 to September 2023.

** Amount applied in previous year's filing.
*** Reflects Corrected Carrying Costs Rates Applied for 2022 and 2023 Annual Filings

Adjusted Balance Reported Prior Year	24,981.30	2,993.31
Difference Due to Corrected Carrying Costs Rates Applied in ADIT and Carrying Cost	(2,514.91)	(74.22)

Schedule 5

Atlanta Gas Light Company
Calculation of Carrying Cost on Third Party Recoveries - Ratepayer Portion
Received July 1, 2023 through June 30, 2024

Month	Date Received	Amount	Balance	Days Outstanding	Factor * (.072008/365 Days)/.7496	Carrying Cost
Balance from previous year.			0.00			0.00
Amount applied in prior year's filing			0.00			0.00
Balance						
July			0.00	31	0.000263	0.00
August			0.00	31	0.000263	0.00
September			0.00	30	0.000263	0.00
October			0.00	31	0.000263	0.00
November			0.00	30	0.000263	0.00
December			0.00	31	0.000263	0.00
January			0.00	31	0.000263	0.00
February			0.00	28	0.000263	0.00
March			0.00	31	0.000263	0.00
April			0.00	30	0.000263	0.00
May			0.00	31	0.000263	0.00
June			0.00	30	0.000263	0.00
July			0.00	31	0.000263	0.00
August			0.00	31	0.000263	0.00
September			0.00	30	0.000263	0.00
Balance at 10/1/24			0.00			0.00

* After tax cost of capital - 7.2008% and revenue expansion factor - .7496.

9. Environmental Response Cost (ERC) Recovery Rider (continued)

9.5 Current Rate

Effective October 1, ~~2023~~2024, a rate of $~~2.18~~0.84 per Dt of DDDC per year shall be assessed based upon the terms of this Rider per year.

9. Environmental Response Cost (ERC) Recovery Rider (continued)

9.5 Current Rate

Effective October 1, 2024, a rate of $0.84 per Dt of DDDC per year shall be assessed based upon the terms of this Rider per year.