BEFORE THE PUBLIC SERVICE COMMISSION
STATE OF GEORGIA

IN RE:	
Application of Atlanta Gas Light Company for Amended Certificate of Public Convenience and Necessity for Meriwether County	**Docket No. 30300**
Countywide Safety Plan for Meriwether	**Docket No. 29309**

ATLANTA GAS LIGHT COMPANY'S OBJECTION TO PETITION FOR LEAVE TO INTERVENE OF THE CITY OF HOGANSVILLE, GEORGIA AND RESPONSE TO CITY OF HOGANSVILLE'S OBJECTION

Atlanta Gas Light Company ("AGL") objects to the Petition for Leave to Intervene of the City of Hogansville, Georgia.

BACKGROUND

On August 21, 2024, AGL filed its Application for an Amended Certificate of Public Convenience and Necessity for Meriwether County ("AGL's Application"). Also on August 21, 2024, AGL and Liberty Utilities (Peach State Natural Gas) Corp. ("Liberty") filed a Joint Petition for Expedited Approval to Amend the Countywide Safety Plan for Meriwether County and Waive the Hearing Requirement. On September 5, 2024, Hogansville and the City of Grantville, Georgia filed an Objection to Expedited Review of the Joint Petition and Certificate of Public Convenience and Necessity for Meriwether County. On September 17, 2024, Hogansville filed a petition for leave to intervene.

AGL respectfully requests that the Commission deny Hogansville's Objection and its Petition for Leave to Intervene for the reasons described below.

DISCUSSION

The Commission should deny Hogansville's Petition for Leave to Intervene. Under O.C.G.A. § 46-4-59(c), Hogansville's Petition must "set forth with particularity the facts pertaining to his interest and the grounds upon which his application for intervention are based." The Commission shall *only* permit intervention for the following persons:

> (1) a person upon whom a statute confers an unconditional right to intervene;
> (2) a person who demonstrates a legal, property, or other interest in the proceeding…;[1] or
> (3) any member of the General Assembly of the State of Georgia, who may without fee intervene on behalf of his constituents with the full rights and privileges of a designated party.

O.C.G.A. § 46-2-59(e). Hogansville fails to meet these requirements.

AGL's Application does not infringe on any of Hogansville's rights. Hogansville does not operate or have gas distribution facilities in Meriwether County. Hogansville's only alleged interest in Meriwether's Countywide Safety Plan is that it has a contract with Liberty for the supply of natural gas from Hogansville to Liberty and "seeks active participation in this proceeding to protect its interests and to address issues being raised by these dockets." Hogansville fails to show how its contract with Liberty is "an interest in this proceeding" regarding the Meriwether Countywide Safety Plan and the Certificate amendments. Hogansville's contract with Liberty is not an interest that is impacted by the proposed Meriwether Countywide Safety Plan and Certificate amendments, and therefore, does not support Hogansville's participation.

Additionally, Hogansville's Objection to the Joint Petition for Expedited Review of the Meriwether Countywide Safety Plan does not ask for any relief other than a request for the Commission to not review the Meriwether Countywide Safety Plan on an expedited basis and fails

[1] In determining whether to permit intervention, the hearing officer may consider whether the person's interest is adequately represented by other parties and whether the intervention will unduly delay the proceedings or prejudice the rights of other parties.

to state its interest in the Meriwether Countywide Safety Plan or AGL's Application. Because Hogansville is not an Operator in Meriwether County, does not allege that it "proposes to serve the area in question," and does not propose "to establish or extend gas service," as required for participation as a party "with a real interest," the Commission should deny Hogansville's Petition to Intervene and dismiss its Objection. *See* Ga. Comp. R. & Regs. 515-7-1-.12. AGL requests that the Commission include this matter as a discussion item at the Commission's next regularly scheduled Energy Committee Meeting.

This 2nd day of October 2024.

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the within and foregoing Atlanta Gas Light Company's Objection to Petition for Leave to Intervene of the City of Hogansville, Georgia and Response to City of Hogansville's Objection upon the following persons via email or United States Mail as follows:

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This 2nd day of October 2024.

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