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October 2, 2024

VIA ALTERNATIVE E-FILE

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

RE: Docket No. 41159
Docket No. 29309

Dear Ms. Tanner:

Enclosure:

1. Liberty Utilities Corp.'s Objections to Petition for Leave to Intervene of the City of Grantville, Georgia and Response to City of Grantville's Objection

Please find enclosed the document set forth above. The document is being filed with the Commission via Alternative Electronic Filing. Please return a file-stamped copy to the undersigned.

Thank you for your assistance in this matter.

Respectfully submitted,

HULSEY, OLIVER & MAHAR, LLP
Attorneys for Liberty Utilities

By: _____
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Ms. Michelle Thebert, *via email*
Ms. Lindsey Williamson, *via email*
Mr. Tom Bond, *via email*

BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION

IN RE:	)	
	)	
Liberty Utilities (Peach State Natural Gas) Corp.'s Application for Amended Distribution System and Pipe Line Certificate of Public Convenience and Necessity in Meriwether County	)	Docket No. 41159
	)	
Countywide Safety Plan for Meriwether.	)	Docket No. 29309

LIBERTY UTILITIES CORP.'S OBJECTIONS TO PETITION FOR LEAVE TO INTERVENE OF THE CITY OF GRANTVILLE, GEORGIA AND RESPONSE TO CITY OF GRANTVILLE'S OBJECTION

Liberty Utilities (Peach State Natural Gas) Corp. (hereinafter, "Liberty") submits these Objections to Petition for Leave to Intervene of the City of Grantville, Georgia, and responds to the Objection of the City of Grantville. Liberty requests that the Commission include this matter as a discussion item at the Commission's next regularly scheduled Energy Committee Meeting and states as follows.

On August 21, 2024, Liberty filed its Application to Amend its Certificate of Public Convenience and Necessity for Meriwether County. On September 5, 2024, 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 9, 2024, after learning that the City of Grantville, Georgia had annexed a portion of Meriwether County, Georgia, Liberty served Grantville with a copy of Liberty's Application. On September 17, 2024, Grantville filed its Petition for Leave to Intervene of the City of Grantville, Georgia, claiming that Grantville has an interest in the issues presented in Liberty's Application to Amend its Certificate, and seeking active participation in the proceeding. Liberty objects to intervention by Grantville for the reasons set forth below.

Pursuant to O.C.G.A. § 46-2-59(c), Grantville, as the purported intervenor, is required to "set forth with particularity the facts pertaining to his interest and the grounds upon which his application for intervention are based." The Commission or hearing officer has limited authority to allow intervention; only three categories of applicants are permitted to intervene, as set forth in O.C.G.A. § 46-2-59(e). Grantville does not fall within any of the categories of parties that are allowed to intervene as established by Georgia law.

Likewise, Commission regulations do not contemplate that Grantville is authorized to participate at the hearing on Liberty's Application. Ga Comp. R. & Regs. 515-7-1-.12.

Additionally, Grantville'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 to state its interest in the Meriwether Countywide Safety Plan or Liberty's Application. Liberty's Application does not infringe on any rights of Grantville. It is undisputed that Grantville does not operate in Meriwether County, Georgia, and is not an "Operator" as defined by Ga Comp. R. & Regs. 515-9-7-.01. Grantville does not have gas distribution facilities in Meriwether County. In neither its Petition to Intervene, nor its Objection, does Grantville allege that it is a party with a real interest in Meriwether's Countywide Safety Plan. Grantville's Petition merely states that it has annexed a parcel within Meriwether County and "seeks active participation in this proceeding to protect its interests and to address issues being raised by these dockets." That is an insufficient basis for intervention under applicable law and regulations.

WHEREFORE, Liberty respectfully requests that this matter be set as a discussion item at the Commission's next regularly scheduled Energy Committee Meeting the Commission, that

Grantville's Petition to Intervene be denied, and that its Objection be dismissed for the reasons set forth above.

Respectfully submitted this 2nd day of October, 2024.

/S/ Jason A. Dean

Attorney for Liberty Utilities
(Peach State Natural Gas) Corp.

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BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION

IN RE:	)	
Liberty Utilities (Peach State Natural Gas) Corp.'s	)	Docket No. 41159
Application for Amended Distribution System and	)	
Pipe Line Certificate of Public Convenience and	)	
Necessity in Meriwether County	)	
	)	
Countywide Safety Plan for Meriwether.	)	Docket No. 29309

CERTIFICATE OF SERVICE

The undersigned, on behalf of Liberty Utilities (Peach State Natural Gas) Corp., hereby certify this date furnished a copy of the foregoing **Liberty Utilities (Peach State Natural Gas) Corp.'s Objection to Petition for Leave to Intervene of the City of Grantville, Georgia and Response to City of Grantville's Objection** by email to the following:

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This 2nd day of October, 2024.

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