GEORGIA PROUD
Walton GAS

March 14, 2025

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

RE: STAFF'S FIFTY-EIGHTH SET OF DATA REQUESTS TO **WALTON EMC NATURAL GAS – DN 15727-U**

Dear Ms. Tanner:

Pursuant to the Rules and Regulations of the State of Georgia specifically 515-3-1-.11 Walton EMC Natural Gas is filing its Response to Staff's Fifty-Eighth Set of Data Requests in Docket 15727-U as "Trade Secret" as defined in O.C.G.A. Section 10-1-761(4).

The required protected information is being submitted under protective seal with the designation "TRADE SECRET" prominently attached to each page thereof.

If you have any questions, please call me at 770-266-2371.

Thank you for your assistance.

Sincerely,

Phil Weatherly, Business Development Director
Walton Energy
Walton EMC Natural Gas
pweatherly@waltongas.com

BEFORE THE
GEORGIA PUBLIC SERVICE COMMISSION

IN RE:	APPLICATION OF WALTON EMC NATURAL GAS FOR A NATURAL GAS MARKETER CERTIFICATE OF AUTHORITY	))))	DOCKET NO. 15727

CERTIFICATE OF SERVICE

Pursuant to the Rules and Regulations of the State of Georgia specifically 515-3-1-.11 Walton EMC Natural Gas ("Walton") is filing a Response to Staff's Fifty-Eighth Set of Data Requests in Docket 15727-U to Walton EMC Natural Gas as "Trade Secret" as defined in O.C.G.A. Section 10-1-761(4).

In compliance with Rule 515-3-1-.11(1)(c), Walton states that the retail natural gas marketplace is heavily competitive, and other marketers would gain significant economic advantages from knowing some of Walton's customers and their balances, financial statistics, including monthly operating revenues and monthly operating costs and expenses, and the numbers of commercial and industrial customers with the sales derived from those customers, all of which can provide the basis for marketing strategies as well as an analysis of the strength of the company. Walton Gas can only maintain its ability to compete effectively and achieve success in the marketplace by keeping such information confidential. Walton only shares such information with persons in its senior management, its Board of Directors, and persons providing financial, consulting or other special services who need to know such information to function effectively in their relationship with Walton, and who will keep such information confidential.

This is to certify that I have this 14h day of March 2025 filed the required protected information, specifically **Walton EMC Natural Gas' Response to STAFF'S FIFTY-EIGHTH SET OF DATA REQUESTS – DOCKET 15727-U,** submitted under protective seal with the designation "TRADE SECRET" prominently attached to each page thereof.

At the same time, I have filed a version of the document containing the protected information which can be used for public disclosure with the designation "PUBLIC DISCOSURE" prominently attached to each page thereof is being submitted in accordance with the Alternative Electronic Filing Procedures outlined on the Commission's home web page.

Respectfully submitted this 14th day of March 2025,

Phil Weatherly
Director, Business Development
Walton EMC Natural Gas
PO Box 260
842 US Hwy 78, NW
Monroe, GA 30655
770-266-2371
pweatherly@waltongas.com

AFFIDAVIT OF PHIL WEATHERLY

CAME BEFORE, the undersigned attesting officer, Phil Weatherly, who, being duly sworn, deposed, and stated as follows:

1.

My name is Phil Weatherly. I am over the age of eighteen, suffer from no legal disabilities and am able to give this Affidavit.

2.

I am the Business Development Director of Walton EMC Natural Gas and have been duly authorized by Walton EMC Natural Gas's Board of Directors to prepare this Affidavit and cause it to be submitted along with any such filings made with the Public Service Commission it deems to contain trade secrets.

3.

As required by O.C.G.A. § 50-18-72(a)(34), I hereby declare that Walton EMC Natural Gas's filing of its official response to Staff's Fifty-Eighth Set of Data Requests in Docket 15727 contains trade secrets pursuant to Article 27 of Chapter 1 of Title 10 of the Official Code of Georgia Annotated.

4.

Under penalties of perjury, I declare that I have examined this information, including accompanying documents, and, to the best of my knowledge and belief, the information is true, correct, and complete.

FURTHER AFFIANT SAYETH NOT.

Phil Weatherly

Business Development Director
Walton EMC Natural Gas
Walton Energy

Sworn to and subscribed before me this

14th day of March 2025.

NOTARY PUBLIC

SAVANNAH A MORRIS
NOTARY PUBLIC
COMMISSION EXPIRES
FEBRUARY 8, 2027
WALTON COUNTY, GEORGIA

My Commission Expires:
2/8/2027

Public Disclosure

BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION

IN RE:	APPLICATION OF WALTON EMC NATURAL GAS FOR A NATURAL GAS MARKETER CERTIFICATE OF AUTHORITY	))))	DOCKET NO. 15727

STAFF'S FIFTY EIGHTH SET OF DATA REQUESTS TO WALTON EMC NATURAL GAS

Walton EMC Natural Gas hereby provides this PUBLIC DISCLOSURE copy of our response to your requests for the information specified below:

INFORMATION REQUEST

The requested information below shall be routinely requested on a quarterly basis and in accordance with Commission Rule 515-7-3-.07(7) and O.C.G.A. § 46-4-153(f).

12-Months Ending December 2024 (January-December)

***Please provide all responses in the Staff's Attachment-1 spreadsheet with one worksheet for each response labelled 1 - 28. If additional worksheets are needed, label as 1a., 1b., 1c. ….etc.**

Section-I. Financial Capability Data

STF-58-1 Please update the 4Q 2024 information using Attachment-1. Yes or no, does the marketer continue to meet all financial capability requirements provided in Commission Rule 515-7-3-.07(7) and O.C.G.A. § 46-4-153(f)?

Response: Filed as Trade Secret

Public Disclosure

STF-58-2 Please update the 4Q 2024 information using Attachment-1. Cumulatively, for each month of the **12-Months Ending December 2024** for the Georgia market, please provide a detailed income statement with totals for all the major categories such as revenues, costs, operating expenses, and net income. Please include all Firm and Interruptible activity that lists at a minimum of the following as an electronic Excel spreadsheet with live and unlocked formulas:

a. Revenues broken out by customer class and other revenues.

b. Cost of Sales Breakout

c. Lower Cost or Market (LCM) Activity

d. Hedging Financial Activities as an offset or addition to Cost of Sales

e. AGL Base Charges

f. Operating Expenses

   i. General and Administrative

   ii. Marketing Expense

   iii. Interest Expense

   iv. Bad Debt Allowance

   v. Taxes

g. Net Income

When it comes to income statement categories, the marketer should not make major changes from quarter to quarter, and if a major change has taken place, it should be discussed how the new account categories fit with the previously filed information. Please break out each month separately.

Response: Filed as Trade Secret

STF-58-3 Please update the 4Q 2024 information using Attachment-1. Cumulatively, for each month of the **12-Months Ending December 2024** for the Georgia market, please provide a detailed balance sheet with Firm and Interruptible activity that lists at a minimum of the following as an electronic. Please include a breakout of current assets and current liabilities:

a. Cash on Hand

b. Cash Equivalents

c. Receivables

d. Inventories

e. **Detailed Current Assets Breakdown**

f. Total Assets

g. **Detailed Current Liabilities Breakdown**

h. Accounts Payable

i. Short-Term

j. Long-Term Debt

k. Total Liabilities

l. Equity information

When it comes to balance sheet categories, the marketer should not make major changes from quarter to quarter, and if a major change has taken place, it should be discussed how the new account categories fit with the previously filed information. Please break out each month separately.

Response: Filed as Trade Secret

STF-58-4 Please update the 4Q 2024 information using Attachment-1. Please provide the fiscal year dates used by the marketer and provide the most recent audit financials, if applicable.

Response: Filed as Trade Secret

STF-58-5 Please update the 4Q 2024 information using Attachment-1. Cumulatively, for each month of the **12-Months Ending December 2024** for Georgia operations, beginning with the first day and ending with the last day of each month please provide the number of customers billed for each customer class--Residential, Commercial/Industrial, and Interruptible--separately for each month within the period of **January – December 2024**. Beginning with the first day and ending with the last day of each month, please provide the number of therms billed for each customer class--Residential, Commercial/Industrial, and Interruptible--separately for each month within the period of **January – December 2024**. Please list this information as therms and not dekatherms.

Please provide the responses **in the format below as an Excel spreadsheet** with live and unlocked formulas:

Customer Count

Year 2024	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
Residential													
Commercial / Industrial													

Interruptible													
Total													

Therms

Year 2024	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total Therms
Residential													
Commercial / Industrial													
Interruptible													
Total Therms													

Response: Filed as Trade Secret.

STF-58-6 Please update the 4Q 2024 information using Attachment-1. If the Company has operations in other states, please list the states and the type of business activities.

Response: Filed as Trade Secret.

STF-58-7 Please update the 4Q 2024 information using Attachment-1. Please provide the most recent audited financials for the Georgia marketer (Georgia Only), if applicable.

Response: Filed as Trade Secret.

STF-58-8 Please update the 4Q 2024 information using Attachment-1. Cumulatively, for each month of the **12-Months Ending December 2024**, if the Company has operations in other states, provide as an electronic Excel spreadsheet with live and unlocked formulas, please provide an income statement and balance sheet of total operations (Combined Georgia & Outside of Georgia).

Response: Filed as Trade Secret.

STF-58-9 Please update the 4Q 2024 information using Attachment-1. Please provide the most recent audited financials for the total company (Georgia & Outside Georgia), if applicable.

Response: Filed as Trade Secret.

STF-58-10 Please update the 4Q 2024 information using Attachment-1. Cumulatively, for each month of the **12-Months Ending December 2024**, for the parent company or total operations, please provide a detailed income statement. Please total all the major categories such as revenues, costs, operating expenses, and net income.

a. All Revenues

b. Cost of Sales

c. Hedging Financial Activities as an offset or addition to Cost of Sales

d. AGL Base Charges

e. Operating Expenses

   i. General and Administrative

   ii. Marketing Expense

   iii. Interest Expense

   iv. Bad Debt Allowance

   v. Taxes

g. Net Income

When it comes to income statement categories, the marketer should not make major changes from quarter to quarter, and if a major change has taken place, it should be discussed how the new account categories fit with the previously filed information. Please break out each month separately.

*If the parent company is a publicly traded company, or issuer, please state the response as "Publicly Traded" and provide an electronic web address or link where the Staff can review the appropriate 10Q.

Response: Filed as Trade Secret.

STF-58-11 Please update the 4Q 2024 information using Attachment-1.Cumulatively, for each month of the **6-months December 2024**, for the parent company or total operations, please provide a detailed balance sheet by month with all business activities that lists at a minimum of the following as an electronic Excel spreadsheet with live and unlocked formulas.

Please include a breakout of current assets and current liabilities:

a. Cash

b. Cash Equivalents

c. Receivables

d. Inventories

e. Detailed Current Assets Breakdown

f. Total Assets

g. Detailed Current Liabilities Breakdown

h. Accounts Payable

i. Short-Term and Long-Term Debt

j. Total Liabilities

k. Equity information

When it comes to balance sheet categories, the marketer should not make major changes from quarter to quarter, and if a major change has taken place, it should be discussed how the new account categories fit with the previously filed information. Please break out each month separately.

*If the parent company is a publicly traded company, or issuer, please state the response as "Publicly Traded" and provide an electronic web address or link where the Staff can review the appropriate 10Q.

Response: Filed as Trade Secret.

STF-58-12 Please update the 4Q 2024 information using Attachment-1. Please answer the following concerning financial support.

a. If the marketer has received any loans from its parent company, please provide the dollar amount of the loans.

b. If the marketer has received any equity investment from the parent company, please provide the dollar amount.

c. If the marketer has received any other financial support from the parent company, please describe the financial support, such as credit facilities, assets, debt relief, letters of credit, or money pool access.

d. Has the marketer received any financial support from an affiliate company or subsidiary? If so, please state the entity and describe the support.

Response: Filed as Trade Secret.

STF-58-13 Please update the 4Q 2024 information using Attachment-1. Currently, related to continuing as an ongoing concern, is the Georgia marketer, or its parent company, engaging in, or considering, a Chapter 7 or Chapter 11 proceeding, or other similar proceeding, in Georgia or other States? If yes, please provide a detailed explanation.

Response: Filed as Trade Secret.

STF-58-14 Using the filed Attachment-1 filed response to the 53rd Set, please update with the 4Q 2024 information. Due to its continued financial performance or financial goals, does the marketer have concerns about continuing operations in Georgia? Please explain.

Response: Filed as Trade Secret.

Section-II: Technical Capability Data

STF-58-15 Please update the 4Q 2024 information using Attachment-1. Yes or no, does the marketer continue to meet all technical capability requirements provided in Commission Rule 515-7-3-.07(7) and O.C.G.A. § 46-4-153(f)?

Response: Filed as Trade Secret.

STF-58-16 Please update the 4Q 2024 information using Attachment-1. Regarding AGL's credit requirements, please answer the following:

a. What is the current credit requirement from AGL?

b. What method is used to meet the AGL credit requirement and what financial institution is helping to meet the requirement?

Response: Filed as Trade Secret.

STF-58-17 Please update the 4Q 2024 information using Attachment-1. Yes or no, does the marketer's gas operations staff continue internal training and proficiency with AGL's GOS system and bringing natural gas to Georgia?

Response: Filed as Trade Secret.

STF-58-18 Please update the 4Q 2024 information using Attachment-1. If the marketer has incurred any AGL penalties during the quarter, please list the type of penalty, dollar amount of the penalty, the month incurred, and when the funds were paid to AGL.

Response: Filed as Trade Secret.

STF-58-19 Please update the 4Q 2024 information using Attachment-1. Regarding the credit requirements of the major pipelines, please answer the following:

a. Does the marketer provide in-house natural gas operations? If not, please provide the name of the third-party vendor that provides natural gas operations on the marketer's behalf.

b. Does the marketer directly provide the credit requirement to the major pipelines?

c. Does the marketer's parent company provide the credit requirement to the major pipelines?

d. Does the marketer's third-party gas operations vendor provide the credit requirement to the major pipelines?

e. What is the current credit requirement of the major pipelines?

f. What method is used to meet the credit requirements of the major pipelines and what financial institution is helping to meet the requirement?

g. Does the marketer use a third party to meet the credit requirements, such as an asset manager?

h. If the marketer believes doesn't have any credit requirements with the major pipelines, please explain how it can transport gas without posting credit.

Response: Filed as Trade Secret.

STF-58-20 Please update the 4Q 2024 information using Attachment-1. During the past quarter, and or currently, does the marketer have any problems with any of its natural gas contracts?

Response: Filed as Trade Secret.

STF-58-21 Please update the 4Q 2024 information using Attachment-1. During the past quarter, and currently, does the marketer have problems with any of its storage contracts?

Response: Filed as Trade Secret.

STF-58-22 Please update the 4Q 2024 information using Attachment-1. Due to its continued technical performance and ongoing credit requirements, does the marketer have concerns about continuing operations in Georgia? Please explain.

Response: Filed as Trade Secret.

Section-III: Other Items

STF-58-23 Please update the 4Q 2024 information using Attachment-1. Does the marketer have any ongoing legal issues in Georgia and/or other states? If so, please explain.

Response: Filed as Trade Secret.

STF-58-24 Please update the 4Q 2024 information using Attachment-1. Regarding customer incentives, please answer the following:

a. Does the marketer offer any incentives to attract new customers?

b. Does the marketer work with any third parties to attract new customers?

c. Does the marketer work with any EMC's or municipal entities to attract new customers?

d. Does the marketer routinely offer discounts to Residential and Commercial/Industrial customers to attract those customers?

Response: Filed as Trade Secret.

STF-58-25 Please update the 4Q 2024 information using Attachment-1. Regarding mergers and acquisitions, please answer the following.

a. Currently, does the Georgia marketer, or its parent company, have any plans for acquiring customers in a State other than Georgia and serving customers in that State?

b. Currently, is the Georgia marketer, or its parent company, engaged in any discussions with other Georgia marketer(s) about acquiring their customers and/or business? If yes, please explain.

c. Currently, is the marketer, or its parent company, engaged in any discussions with an entity that isn't a Georgia marketer about selling its customers to that entity? If yes, please explain.

d. Currently, is the marketer, or its parent company, engaged in any discussions with another Georgia marketer(s) about selling its customers and/or business to another Georgia marketer? If yes, please explain.

Response: Filed as Trade Secret.

STF-58-26 Please update the 4Q 2024 information using Attachment-1. Please provide a list of categories in the Georgia income statement and balance sheet that are based on allocated numbers.

Response: Filed as Trade Secret.

STF-58-27 Please update the 4Q 2024 information using Attachment-1. Regarding bad debt, please answer the following.

a. What is the marketer's current bad debt policy?

b. Has there been changes to bad debt policy in 2024 from 2023. If yes, please specify.

c. At what point does the marketer write-off bad debt, 30 days, 60 days, 90 days after non-payment?

d. Does the marketer use the Direct Write Off Method or the Provision Method to account for bad debt?

e. How does the marketer engage in collections?

f. How is the marketer's allowance for bad debt calculated?

g. Based on a customer's credit score, when does the marketer charge a deposit?

h. Based on a customer's credit score, when does a marketer deny service?

i. During the 4Q 2024, what was the marketer's bad debt percentage? What was it for the 4Q 2023?

j. During the 4Q 2024, how many customer accounts were written off? During the 4Q 2023 how many customer accounts were written off?

k. During the 4Q 2024 how many customers entered into payment arrangements? During the 4Q 2023, how many customers entered into payment arrangements?

Response: Filed as Trade Secret.

STF-58-28 Please update the 4Q 2024 information using Attachment-1. Regarding O.C.G.A. 46-4-164(b), it states the following:

> **(b)** Notwithstanding any provision of law to the contrary, including, without limitation, Article 4 of Chapter 3 of this title, an electric membership corporation may make and maintain investments in, lend funds to, and guarantee the debts and obligations of an EMC gas affiliate in total not to exceed 15 percent of such electric membership corporation's net utility plant, excluding electric generation and transmission assets as defined by the Federal Energy Regulatory Commission Uniform System of Accounts in effect at the time of such investment, loan, or guarantee, provided that any such investments or loans shall not reflect rates which are generally available through the use of any tax exempt financing and may not be tied to any loans from or guaranteed by the federal or state government; and an EMC gas affiliate of an electric membership corporation organized and operating pursuant to Article 4 of Chapter 3 of this title may apply for and be granted a certificate of authority to provide any service as authorized under this article. The creation, capitalization, or provision of management for:
>
> **(1)** An EMC gas affiliate engaged in activities subject to the provisions of this article and the rules and regulations established by the commission; or
>
> **(2)** Other persons providing customer services
>
> shall be deemed to be among the purposes of an electric membership corporation as specified in paragraphs (2) and (3) of Code Section 46-3-200. Nothing in this article shall be deemed to increase or decrease the authority and jurisdiction of the commission with respect to such electric membership corporation except as to gas activities undertaken by the electric membership corporation or its EMC gas affiliate as authorized under this chapter.

Public Disclosure

Regarding any EMC parent company support, please complete Table below that provides the calculation percentage of EMC parent company support to the EMC gas affiliate.

EMC Assets

Total EMC Assets	
Minus Generating Assets	
Minus Transmission Assets	
Net EMC Assets	

EMC Support to Gas Affiliate

a. Equity Support	
b. Loan Support	
c. Credit Support	
d. Asset Support	
e. Other Support	
Total Support	

Percentage Support to Gas Affiliate	

Response: See corresponding tab in Attachment A.