BERGER SINGERMAN

Floyd R. Self
(850) 521-6727
fself@bergersingerman.com

July 1, 2025

Ms. Sallie Tanner
Executive Secretary
Georgia Public Service Commission 244 Washington Street, S.W.
Atlanta, GA 30334-9052

Docket No. 56178
Liberty Utilities (Peach State Natural Gas) Corp.
2025 -2026 Gas Supply Plan
Public Disclosure Filing of the 2025 -2026 Gas Supply Plan
and
Trade Secret Filing of Liberty Utilities' 2025 -2026 Gas Supply Plan

Dear Ms. Tanner:

Liberty Utilities (Peach State Natural Gas) Corp. hereby files its 2025 -2026 Gas Supply Plan in the above-referenced docket. I am filing this letter, a Petition, the pre-filed direct testimony of Martin DeBruin, Exhibits I through VI, and a Statement of Compliance with the Minimum Filing Requirements as set forth in Commission Rule 515-7-2-.04. Also enclosed is a Trade Secret Filing, by which Liberty Utilities is providing to Staff Trade Secret copies of the Gas Supply Plan.

Please call if you have any questions. Thank you.

Regards,

BERGER SINGERMAN LLP



By: Floyd R. Self

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

313 NORTH MONROE STREET | SUITE 301 | TALLAHASSEE, FLORIDA 32301
t:(850) 561-3010 | f: (850) 561-3013 | WWW.BERGERSINGERMAN.COM

STATE OF GEORGIA
BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION

IN RE:	)	
	)	
LIBERTY UTILITIES (PEACH STATE NATURAL GAS) CORP. 2025 – 2026 GAS SUPPLY PLAN	)	**DOCKET NO. 56178**
	)	
	)	

PETITION FOR APPROVAL OF THE
2025 – 2026 GAS SUPPLY PLAN FILING OF
LIBERTY UTILITIES (PEACH STATE NATURAL GAS) CORP.

Liberty Utilities (Peach State Natural Gas) Corp. ("Liberty Utilities" or the "Company") hereby files with the Georgia Public Service Commission ("Commission") its 2025 – 2026 Gas Supply Plan ("Plan"), including this petition requesting approval of the Plan in the above-referenced docket. In support of this petition, Liberty Utilities submits the following:

1. This gas supply plan filing is made pursuant to Georgia's gas supply plan and adjustment factor statute, O.C.G.A. § 46-2-26.5, which directs the Company to file a gas supply plan and adjustment factor by August 1 of each year.

2. The Company's 2025 – 2026 Gas Supply Plan is described in the filing cover letter, this petition, the Company's pre-filed testimony, forecasts, exhibits, Statement of Minimum Filing Requirements, and supporting materials filed in this docket.

3. The Company is filing the design day forecasts for the 2025 – 2026 Gas Supply Plan Year as directed by the Commission's Procedural and Scheduling Order of April 15, 2025, consistent with the Commission-approved Stipulation in the 2024 – 2025 Gas Supply Plan, Docket No. 55650. The design day forecasts for the 2025 – 2026 Gas Supply Plan are included as Exhibit II to the pre-filed direct testimony of Marty DeBruin, Liberty Utilities' Manager, Gas Supply and Planning, filed with this Petition.

4. Liberty is filing its Gas Supply Plan and an Adjustment Factor for the twelve (12) months of the 2025 – 2026 recovery year beginning October 1, 2025.

5. Contemporaneously herewith, the Company is filing the pre-filed direct testimony of Marty DeBruin, together with the exhibits (numbered I through VI), Statement of Compliance with Minimum Filing Requirements, and other materials referenced therein. The Company hereby gives notice to Staff and to any intervening parties that it intends to use the forecasts, supporting information, exhibits, and charts attached to or embedded within the pre-filed testimony as well as any attached or imbedded charts, graphs and illustrations contained within the pre-filed testimony (including both direct and rebuttal testimony, if any) in the hearing on this matter.

WHEREFORE, Liberty requests that this Commission approve the 2025 – 2026 Gas Supply Plan as filed and specifically approve, acknowledge or authorize, without limitation, the following:

1. Approve the Company's 2025 – 2026 Gas Supply Plan, including the Company's projected design day forecast along with the Company's annual requirements forecast to serve customers in both the Gainesville service areas (including the certificated service areas in and around Gainesville, including but not limited to Hall and Jackson Counties) and the Columbus service areas (including the certificated areas in and around Columbus, including but not limited to areas in Muscogee, Talbot, Meriwether and Harris Counties);

2. Approve the proposed array of supply and capacity assets that will be used to serve those requirements, more specifically including, but not limited to:

   a. Out-of-state storage in the amounts specified in the Exhibits to Mr. DeBruin's pre-filed direct testimony;
   b. Interstate transportation in the amounts specified in the Exhibits;
   c. Natural gas commodity to be provided pursuant to Asset Management Agreements;

3. Approve the adjustment factors proposed by the Company to recover its purchased gas costs during the recovery year, together with the calculations that produce such factors;

4. Approve a continuation of the Company's Gas Supply Hedging Plan described within this Gas Supply Plan filing including continued use of the layered, ratable hedging implementation through the 2025 - 2026 Plan Year for up to 30% of winter volumes; and, approve hedging of up to 10% (or one-third of the overall 30%) of winter purchases to be hedged through the third winter ahead, resulting in hedges that would extend through March

30, 2028, as explained in the pre-filed direct testimony of Mr. DeBruin; and, authorize the Company to recover costs associated with the hedging plan through the purchased gas cost adjustment (PGA) mechanism;

5. Authorize the extension of the current Performance-based Regulation ("PBR") program through September 30, 2026 (originally approved in Docket No. 6753-U, modified in Docket No. 25013-U, and reauthorized and extended in Docket Nos. 34118, 35876, 36793, 38137, 39388, 40291, 41154, 41870, 42316, 42965, 43811, 44392, 45083 and 55650);

6. Authorize Liberty to file changes in PGA rates, through the end of the 2025 – 2026 Gas Supply Plan Year (September 30, 2026), that will become effective in as few two days following the filing;

7. Approve tariff amendments to require written notice of a customer's intent to enroll or unenroll in the Optional Gas Service Rate Schedule 850 and the Transportation Service Rate Schedule 860 by April 1st of each year, with the enrollment elections to become effective on June 1st of each year; and

8. Grant such additional approvals and authorizations as are necessary and / or desirable for the Company to accomplish the goals, objectives and tasks identified as part of the Liberty Utilities (Peach State Natural Gas) Corp. 2025 – 2024 Gas Supply Plan.

This 1st day of July 2025.

Respectfully submitted,
Floyd R. Self, Attorney for Liberty Utilities
(Peach State Natural Gas) Corp.



By: Floyd R. Self

313 North Monroe Street
Tallahassee, FL32301
Voice: 850-566-6347
fself@bergersingerman.com

STATE OF GEORGIA
BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION

IN RE:		
LIBERTY UTILITIES (PEACH STATE NATURAL GAS) CORP. 2025 – 2026 GAS SUPPLY PLAN	)	**DOCKET NO. 56178**

TRADE SECRET FILING OF
LIBERTY UTILITIES (PEACH STATE NATURAL GAS) CORP.

Simultaneously with this filing, Liberty Utilities (Peach State Natural Gas) Corp. ("Liberty Utilities" or the "Company") is filing with the Georgia Public Service Commission ("Commission") the Company's 2025 - 2026 Gas Supply Plan ("Plan"), which includes the pre-filed direct testimony of Martin Debruin, together with the exhibits ("Exhibits") sponsored as part of the Company's Plan. These Exhibits contain materials that are of a proprietary and trade secret nature. Additionally, Liberty Utilities is providing Excel-based models and supporting information (collectively, the "Models") that Calculate Design Day and Final Delivery Capacity Summaries for the Company's service areas in and around Columbus and Gainesville in the above-referenced docket. The Exhibits, Models, and supporting information contain data, materials, information, and processes that are of a proprietary and trade secret nature. Liberty Utilities is therefore filing the proprietary and trade secret Models and portions of these Exhibits pursuant to Commission Rule 515-3-1-.11 governing trade secrets. Additionally, the data and information are exempt from public disclosure under O.C.G.A. § 50-18-72(a)(34).

The Models and Exhibits contain information, more specifically identified in Appendix A attached hereto, that the Company deems to be proprietary. The Company is providing the trade secret documents and information as part of its 2025 – 2026 Gas Supply Plan because they contain information that is required by the Commission's Rules and Minimum Filing Requirements to be filed as part of a gas supply plan. The information derives economic value to the Company and to the Company's customers from not being generally known to others. Liberty Utilities submits the data and pricing information are highly confidential and competitively sensitive. Accordingly, consistent with the Company's own interests, and the interests of its customers, the Company protects against disclosure of this information.

Pursuant to the terms of Commission Rule 515-3-1-.11, Liberty Utilities is providing information under protective seal (each page is marked "Trade Secret"). The trade secret documents have been numbered and the Company is maintaining a master list of these documents. Additionally, the affidavit of Manuel Cifuentes is attached hereto.

Respectfully submitted this 1st day of July 2025.

FLOYD R. SELF, Attorney for
Liberty Utilities (Peach State Natural Gas) Corp.



By: Floyd R. Self

313 North Monroe Street
Tallahassee, FL32301
Voice: 850-566-6347
fself@bergersingerman.com

Appendix A to the
TRADE SECRET FILING OF
LIBERTY UTILITIES (PEACH STATE NATURAL GAS) CORP.
Docket No. 56178
July 1, 2025

List of Exhibit Pages Either Omitted or Redacted Within the Public Disclosure Documents as Trade Secret	
Exhibit Number	**Page Numbers**
Exhibit I	None
Exhibit II	HDD Version 3, 4, 6, 7 and EDD Version 3, 4, 6, 7
Exhibit III	1, 6, 7, 8, 13, 15
Exhibit IV	1, 6, 8, 12, 13, 15
Exhibit V	1, 2, 4, 5, 7, 8, 10, 11, 13, 14
Exhibit VI	1

BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION
STATE OF GEORGIA

IN RE:	)	
	)	
LIBERTY UTILITIES (PEACH STATE NATURAL GAS) CORP.'S 2025 – 2026 GAS SUPPLY PLAN	)	**DOCKET NO. 56178**

AFFIDAVIT FOR TRADE SECRET FILING

COUNTY OF GEORGIA)
STATE OF HALL)

Adam Bigknife, first being duly sworn, deposes and says that he is familiar with the contents of the accompanying Trade Secret records, reports, and Trade Secret Filing, and that to the best of his knowledge and belief, the information in the records and reports constitute trade secrets pursuant to Article 27 of Chapter 1 of Title 10 as set forth in the accompanying Trade Secret Filing.

Signed this 26th day of June, 2025.

By: Adam Bigknife
Adam Bigknife, Sr. Manager,
Rates and Regulatory Affairs
Liberty Utilities

SUBSCRIBED AND SWORN TO before me, the undersigned authority this 26th day of June, 2025.

My Commission Expires: 6/1/2027 Misty Caldwell
Notary Public

MISTY CALDWELL NOTARY PUBLIC EXP. JUNE 1st, 2027 LUMPKIN COUNTY, GA

BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION

IN RE:	)	
LIBERTY UTILITIES (PEACH	)	
STATE NATURAL GAS) CORP.'S	)	**DOCKET NO. 56178**
2025 – 2026 GAS SUPPLY PLAN	)	

CERTIFICATE OF SERVICE

I, Floyd Self, on behalf of Liberty Utilities (Peach State Natural Gas) Corp., hereby certify this date furnished a copy of the foregoing 2025 – 2026 GAS SUPPLY PLAN, including the COVER LETTER, PETITION, PRE-FILED DIRECT TESTIMONY AND EXHIBITS OF WITNESS EARHART, STATEMENT OF COMPLIANCE WITH MINIMUM FILING REQUIREMENTS, and the TRADE SECRET FILING AND SUPPORTING AFFIDAVIT REGARDING THE EXHIBITS by hand deliver, by email, by depositing a copy of same in United States mail with adequate postage affixed thereto, or by a prepaid overnight delivery service addressed to the following:

Sallie Tanner ****
Executive Secretary
Georgia Public Service Commission
244 Washington Street, SW
Atlanta, Georgia 30334-9052

Nancy Tyer ****
Georgia Public Service Commission
244 Washington Street, SW
Atlanta, Georgia 30334
ntyer@psc.ga.gov

Keimani Harvey, Attorney ****
Georgia Public Service Commission
244 Washington Street, SW
Atlanta, Georgia 30334-5701
kharvey@psc.ga.gov

Nijah James ****
Georgia Public Service Commission
244 Washington Street, SW
Atlanta, Georgia 30334
njames@psc.ga.gov

Adam Bigknife, Senior Manager ****
Rates and Regulatory Affairs
Liberty Utilities (Peach State Natural Gas) Corp.
17766 Cleveland Highway
Gainesville, GA 30501
Adam.Bigknife@libertyutilities.com

Dhwani Chheda, Senior Analyst ****
Rates and Regulatory Affairs
Liberty Utilities (Peach State Natural Gas) Corp.
17766 Cleveland Highway
Gainesville, GA 30501
Dhwani.Chheda@libertyutilities.com

This 1st day of July, 2025.

FLOYD R. SELF , Attorney for
Liberty Utilities (Peach State Natural Gas) Corp.

By: _____
Floyd R. Self

313 North Monroe Street
Tallahassee, FL32301
Voice: 850-566-6347
fself@bergersingerman.com

* By Hand Delivery
** By Email
*** By US Mail
****By Overnight Delivery Service