**Rule 515-7-11-.04. Minimum Filing Requirements for the Electing Distribution Company**

At least every third (3rd) year following the date when the rates for commodity sales service within a delivery group or groups become no longer subject to Commission approval, the Electing Distribution Company (“EDC”) shall file with the Commission a Capacity Supply Plan (“CSP”) on or before August 1 of such year. As part of its CSP, the EDC shall include each of the following as minimum filing requirements:

**(a) Background:**

1. An organization chart of the EDC’s current gas or capacity planning and management staffing. The requested organization chart shall provide both the positions and the names of personnel holding the positions.

**RESPONSE:**

See attachment MFR-Background-a-1 (Org Chart).xlsx

**This response was prepared by or under the supervision of Gregory Becker, Director Capacity Planning for Southern Company Gas (“SCG”).**

1. A detailed description of each of the EDC’s liquefied natural gas (“LNG”) facilities including facility’s liquefaction, storage, and vaporization capacities. The information on capacities shall include the following:
   1. Data on rated, planned, and maximum operating parameters;
   2. A full description of any reserve allowance made for planned operation.

**RESPONSE:**

See attachment MFR-Background-a-2 (LNG).xlsx

At least a 10% minimum inventory level must be maintained for safe operation of each plant. Storage figures are total storage capabilities, not usable inventory.

**This response was prepared by or under the supervision of Gregory Becker, Director Capacity Planning for SCG.**

1. A narrative description of the EDC’s methodologies for calculating the design day load.

**RESPONSE:**

See attachment MFR-Background-a-3 (Design Day Narrative).docx

**This response was prepared by or under the supervision of Gregory Becker, Director Capacity Planning for SCG.**

**(b) Historical Data:**

The EDC shall provide the following:

1. The twenty-four (24)-hour average temperature (on 10 A.M. – 9:59 A.M. gas day basis) for the five (5) coldest days by pool, for each of the past nine (9) years.

**RESPONSE:**

See attachment MFR-Historical Data b-1 (5 coldest days by pool).xlsx

**This response was prepared by or under the supervision of Gregory Becker, Director Capacity Planning for SCG.**

1. An illustrative breakdown of the capacity asset array based on the most recently approved CSP.

**RESPONSE:**

See attachment MFR-Historical Data b-2 (capacity asset array).xlsx

**This response was prepared by or under the supervision of Gregory Becker, Director Capacity Planning for SCG.**

1. An average daily weather pattern for planning purposes, using the immediate past ten (10) years of data.

**RESPONSE:**

See attachment MFR-Historical Data b-3 (10 year weather pattern).xlsx

**This response was prepared by or under the supervision of Gregory Becker, Director Capacity Planning for SCG.**

1. The top five (5) peak days for each year out of the most recently approved CSP, by year for the total system, along with the available assets and their aggregate utilization for such days.

**RESPONSE:**

See attachment MFR-Historical Data b-4 (5 peak days).xlsx

**This response was prepared by or under the supervision of Gregory Becker, Director Capacity Planning for SCG.**

1. A summary comparing the ten (10)-year average monthly weather pattern to the total monthly heating degree days (“HDDs”) experienced by the EDC, over the period covered by the most recently approved CSP.

**RESPONSE:**

See attachment MFR-Historical Data b-5 (actual vs historical monthly HDDs).xlsx

**This response was prepared by or under the supervision of Gregory Becker, Director Capacity Planning for SCG.**

1. A summary of the peak demand day for each year of the most recently approved CSP, along with the relevant weather attributes, including HDDs, wind speed, wind direction, cloud cover, and other relevant factors contributing to the actual firm demand.

**RESPONSE:**

See attachment MFR-Historical Data b-6 (peak demand day - weather attributes).xlsx

**This response was prepared by or under the supervision of Gregory Becker, Director Capacity Planning for SCG.**

1. Actual daily firm and interruptible throughput quantities by month and by primary pool measured in dekatherms for the period covered by the most recently approved CSP.

**RESPONSE:**

See attachment MFR-Historical Data b-7 (firm and inter load).xlsx

**This response was prepared by or under the supervision of Gregory Becker, Director Capacity Planning for SCG.**

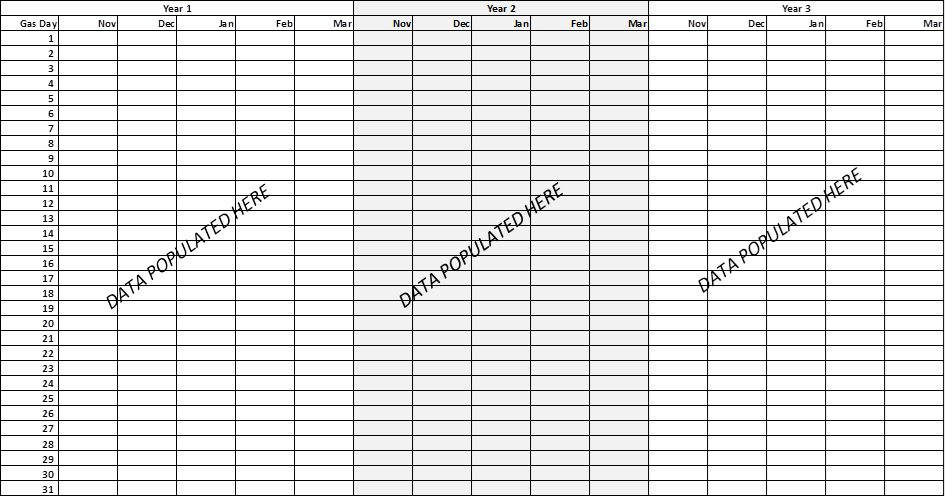
1. A summary table of the no-notice bundled peaking sales service (“BPPSS”) by month for November through March, in each of the past three (3) years. (See chart below)

**RESPONSE:**

See attachment MFR-Historical Data b-8 (no-notice BPPSS).xlsx

**This response was prepared by or under the supervision of Gregory Becker, Director Capacity Planning for SCG.**

1. A summary of discretionary BPPSS utilization by month for November through March, in each of the past three (3) years. (See chart below)



**RESPONSE:**

See attachment MFR-Historical Data b-9 (discretionary BPPSS).xlsx

**This response was prepared by or under the supervision of Gregory Becker, Director Capacity Planning for SCG.**

1. A brief description of the EDC’s activities for the period covered by the most recently approved CSP, with respect to proceedings at the Federal Energy Regulatory Commission (“FERC”).

**RESPONSE:**

See attachment MFR-Historical Data b-10 (FERC proceedings).docx

**This response was prepared by or under the supervision of Elizabeth Wade, Chief Counsel, Regulatory Affairs for SCG.**

1. A detailed description of any unplanned gas supply or capacity disruptions over the last six (6) years. Include:
   1. The dates and duration of the disruptions;
   2. The nature and magnitude of the disruption;
   3. The number of affected firm customers;
   4. The amount of capacity lost; and
   5. Penalties incurred by the EDC due to capacity disruptions or loss.

**RESPONSE:**

See attachment MFR-Historical Data b-11 (unplanned disruptions).docx

**This response was prepared by or under the supervision of Gregory Becker, Director Capacity Planning for SCG.**

1. A schedule, provided on a confidential basis, of penalties incurred by the poolers and marketers pursuant to supply mismatch (“SMM”) violations imposed during the previous six (6) years. Include:
2. Dates marketers incurred SMM violations, associated quantities, and the incentive charges the marketers incurred for failure to meet the liquefaction supply requirements (“LSR”);
3. Dates marketers incurred SMM violations, associated quantities, and the incentive charges the marketers incurred for failure to meet the daily supply requirements (“DSR”);
4. Dates poolers incurred SMM violations, associated quantities, and the incentive charges poolers incurred for such SMM violations;
5. Dates and operational flow order (“OFO”) types and sources of OFO imposed; and
6. Month-end cash out quantities and dollars incurred by poolers.

**RESPONSE:**

See attachment MFR-Historical Data b-12 (supply mismatch) w mktr names.xlsx

**This response was prepared by or under the supervision of Gregory Becker, Director Capacity Planning for SCG.**

1. Actual data that supports the reasonableness of the EDC’s forecast for each year from the most recently approved CSP by including:
   1. The daily variation between forecasted and actual throughput by primary pool group for firm customers;
   2. The historical fitted values from the design day analysis by primary pool group for the actual firm load for the fifteen (15) coldest days;
   3. The historical fitted values from the design day analysis by primary pool group for the actual firm load for the fifteen (15) highest load days; and
   4. The historic days (by date and pool) that required the EDC to utilize BPPSS assets or successor services.

**RESPONSE:**

See attachment MFR-Historical Data b-13 (model variance).xlsx

**This response was prepared by or under the supervision of Gregory Becker, Director Capacity Planning for SCG.**

1. An analysis of use per billing unit over the historical analysis period in developing the design day forecast to identify trends in consumption. Such use per billing unit analysis shall consider input from the marketers and Commission Staff.

**RESPONSE:**

Please see attachment MFR-Historical Data b-14 (pool scatterplots).docx.

The use per billing unit data for the most recent 5 winters was presented at the Winter Recap Meeting on May 6, 2025. The visual analysis shows an increase in average observed usage in the Atlanta, Augusta, Brunswick, Macon, Rome, Ex-Atlanta Transco, and Valdosta pools since the previously filed CSP. Average usage was relatively steady in the Savannah and Ex-Atlanta SNG pools. In addition, the chart labeled Total System Firm Load by Winter vs HDDs showed that warmer winters can generate as much consumption as a cold winter did just a few years ago. Higher consumption in warmer weather winters indicates a baseload consumption increase that is caused by the addition of larger industrial customer load. Once the Design Day regressions were performed, the model tended to agree with most of the observed trends above.

**This response was prepared by or under the supervision of Gregory Becker, Director Capacity Planning for SCG.**

1. A summary of the monthly fixed costs over the period of time covered by the most recently approved CSP from the available firm gas supply resources.

**RESPONSE:**

See attachment MFR-Historical Data b-15 (pipeline costs).xlsx

**This response was prepared by or under the supervision of Gregory Becker, Director Capacity Planning for SCG.**

1. A summary of the interstate pipeline contracts the EDC has or any other party whose contract or purchase agreement affects the EDC’s CSP, including the following details:
   * 1. Parties;
     2. Terms;
     3. Firm transportation available daily, monthly, seasonally, and annually;
     4. Storage available by month, including maximum daily injection quality (“MDIQ”), maximum daily withdrawal quality (“MDWQ”), and maximum storage quantity (“MSQ”);
     5. Applicable prices and rates;
     6. Information regarding receipt and delivery points;
     7. The costs prior to any actions that would increase or reduce the costs; and
     8. Activities that would have reduced the reported costs shall be reported separately (e.g., capacity release, contract negotiations, rate case settlements).

**RESPONSE:**

See attachment MFR-Historical Data b-16 i-viii (interstate pipeline contracts).xlsx

**This response was prepared by or under the supervision of Gregory Becker, Director Capacity Planning for SCG.**

1. A description of the method of transportation to and from storage and whether transportation services are included in the contracts with the storage services.

**RESPONSE:**

See attachment MFR-Historical Data b-17 (storage delivery methods).xlsx

**This response was prepared by or under the supervision of Gregory Becker, Director Capacity Planning for SCG.**

1. A detailed description of any analysis by the EDC concerning the economic consequences and potential risks associated with the extension of the term or termination for all the interstate pipeline contracts.

**RESPONSE:**

See attachment MFR-Historical Data b-18 (economic consequences).docx

**This response was prepared by or under the supervision of Gregory Becker, Director Capacity Planning for SCG.**

1. A complete history of the EDC’s capacity releaseand acquisition activities, as it relates to the EDC’s retained interstate pipeline capacity, performed by the EDC during the period covered by the most recently approved CSP. For each instance, include:
   * 1. Capacity release:
        1. Pipeline, released quantity, released price, released period, and the associated revenues or costs;
        2. The lawful rates allowed by FERC regulations;
        3. Whether recall conditions were placed on the release;
        4. Whether the capacity was recalled prior to the expiration of the release period;
        5. Whether the capacity release had been prearranged at a price other than the maximum lawful price and had not been subject to bid; and
        6. Whether the capacity release had been listed on the pipeline's bulletin board;
     2. A detailed description of any pipeline or transportation capacity that was directly offered to or sought by the EDC, including details on the terms and conditions for such offered capacity and the reasons why the EDC accepted or rejected each individual opportunity;
     3. A summary of all individual contracts with interstate pipelines, or any other party whose contract or purchase agreement affects the EDC’s CSP; and
     4. The amount of all firm capacity under contract from pipeline by the EDC, including but not limited to storage, LNG and peaking.

**RESPONSE:**

See attachment MFR b-19 i-iv (capacity releases).xlsx

**This response was prepared by or under the supervision of Gregory Becker, Director Capacity Planning for SCG.**

1. Information on interruptible customers who converted to firm service in aggregate by pool, including the date of conversion and the customer load characteristics.

**RESPONSE:**

See attachment MFR-Historical Data b-20 (conversions to firm).xlsx

**This response was prepared by or under the supervision of Gregory Becker, Director Capacity Planning for SCG.**

(c) **Forecast Data:**

The EDC shall provide:

* 1. A description of how the forecasts were generated, including data in the analysis period which may have been excluded.

**RESPONSE:**

See attachments MFR-Forecast c-1 (Outliers).xlsx and MFR-Forecast Data c-1 (Methodology).xlsx

**This response was prepared by or under the supervision of Gregory Becker, Director Capacity Planning for SCG.**

* 1. A forecast of daily firm load, by pool, for the next six (6) years, using the ten (10) year average daily weather pattern developed from the provided historical data. The six (6) year firm load forecast shall be used to support the proposed CSP and must include:
     1. All supporting data and work product(s) used to develop the firm load forecast model, along with copies of the input data and calculations used to compute the firm load forecast;
     2. A description of how the firm load forecast was generated. Data in the analysis period which may have been excluded in the EDC's development of the firm load forecast shall also be included in the submission; and
     3. A narrative description of how the firm load forecast and the approach or data used to develop the firm load forecast is different from the most recently approved CSP, if applicable, including a discussion of the differences and examples of how the changes improve forecasting accuracy when compared to historical information.

**RESPONSE:**

See attachments MFR-Forecast Data c-2-i-ATL Calculations.xlsx, MFR-Forecast Data c-2-i-AUG Calculations.xlsx, MFR-Forecast Data c-2-i-BRU Calculations.xlsx, MFR-Forecast Data c-2-i-MAC Calculations.xlsx, MFR-Forecast Data c-2-i-ROM Calculations.xlsx, MFR-Forecast Data c-2-i-SAV Calculations.xlsx, MFR-Forecast Data c-2-i-SNG Calculations.xlsx, MFR-Forecast Data c-2-i-TRA Calculations.xlsx, and MFR-Forecast Data c-2-i-VAL Calculations.xlsx for daily firm load forecasts by pool.

See attachments MFR-Forecast Data c-1 (Outliers).xlsx for firm daily load exclusions and MFR-Forecast Data c-1 (Methodology).xlsx for a description of how the firm daily load forecast was generated.

**This response was prepared by or under the supervision of Gregory Becker, Director Capacity Planning for SCG.**

* 1. A forecast of design day firm load, by pool, for the next six (6) years. The six (6)-year design day firm load forecast shall be used to support the proposed CSP and must include:
     1. All supporting data and work product(s) used to develop the design day firm load forecast model, along with copies of the input data and calculations used to compute the design day firm load forecast;
     2. A description of how the design day firm load forecast was generated. Data in the analysis period which may have been excluded in the EDC’s development of the design day firm load forecast shall also be included in the submission;
     3. A narrative description of how the design day firm load forecast and the approach or data used to develop the design day firm load forecast is different from the most recently approved CSP, if applicable, including a discussion of the differences and examples of how the changes improve forecasting accuracy when compared to historical information; and
     4. Data for each primary pool. The data shall include, at a minimum:
        1. The total number of billing units by each class and rate schedule; and
        2. The total dedicated design day capacity (“DDDC”) represented by each class and rate scheduled.

**RESPONSE:**

See attachments MFR-Forecast Data c-3-i (data and calculations).xlsx, MFR-Forecast Data c-3-ii (Exclusions).xlsx, MFR-Forecast Data c-3-iii (method changes).docx, and MFR-Forecast Data c-3-iv (BUs and DDDC).xlsx

**This response was prepared by or under the supervision of Gregory Becker, Director Capacity Planning for SCG.**

* 1. A summary of the projected utilization of interstate capacity assets, using firm load and design day firm load forecasts, including:
     1. Sufficient information to enable the Commission to evaluate the reasonableness of the EDC’s long-term interstate pipeline and storage contracts by providing the volume of gas flowed by contract by month, by year, and the corresponding load factors;

1. The level of projected firm load requirements in total by month, by primary pool, for a six (6)-year forecast;
2. A summary of the proposed utilization of all capacity including projected end of month storage levels by storage service included in the proposed plan on a contract-by-contract basis;
3. In a format similar to the below table, a summary of the maximum daily winter deliverability for each of the EDC’s system supply source categories. The requested data shall be consistent with the proposed CSP;

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| All Units in Dth per Day | **YEAR 1** | **YEAR 2** | | **YEAR 3** |
| Design Day Load |  |  | |  |
| 5% Reserve Margin |  |  | |  |
| Firm Transportation | |  |  |  | |
| Storage | |  |  |  | |
| Peaking | |  |  |  | |
| On-System Supply | |  |  |  | |
| Total Supply |  |  | |  |

1. An illustrative breakdown of the proposed capacity asset array;
2. The current monthly pipeline rates for interstate assets;
3. Detailed description of any proposed changes for each of the interstate assets from the most recently approved CSP versus the proposed CSP including capacity resources, distribution system and the EDC’s LNG facilities that have altered their level of supply, dispatching or operation characteristics; and
4. Estimated fixed cost charges for any proposed changes to each interstate asset per primary pool group.

**RESPONSE:**

See attachments MFR-Forecast Data c-4 (projected utilization).xlsx and MFR-Forecast Data c-4-vi-(Pipeline Rates).pdf

**This response was prepared by or under the supervision of Gregory Becker, Director Capacity Planning for SCG.**

* 1. Provide and specify the portion of the interstate capacity assets which must be retained and utilized by the EDC in order to manage and operate its system.

**RESPONSE:**

See attachment MFR-Forecast Data c-5 (retained).xlsx

**This response was prepared by or under the supervision of Gregory Becker, Director Capacity Planning for SCG.**