BEFORE THE PUBLIC SERVICE COMMISSION
STATE OF GEORGIA

IN RE:	}	
ATLANTA GAS LIGHT COMPANY'S	}	**DOCKET 56177**
2025-2028 CAPACITY SUPPLY PLAN	}	

PRE-FILED DIRECT TESTIMONY OF PAUL HERRON, LORI SMITH AND DAVID WAGNER

Filed on behalf of Gas South, LLC, Mansfield Power and Gas, SCANA Energy Marketing, LLC, SouthStar Energy Services LLC d/b/a Georgia Natural Gas, True Natural Gas, and Walton Natural Gas (" Marketer Group")

August 7, 2025

PRE-FILED DIRECT TESTIMONY OF PAUL HERRON, LORI SMITH AND DAVID WAGNER ON BEHALF OF NAMED MARKETERS

Q. State your name, title, business name and address.

My name is Paul Herron, Director of Gas Supply for SCANA Energy, 3344 Peachtree Street, Suite 2150, Atlanta, GA 30326.

My name is Lori Smith, Manager of Asset Optimization and Scheduling for True Natural Gas, 807 Collinsworth Road, Palmetto, GA 30268.

My name is David Wagner, Vice President of Supply and Origination for Gas South, LLC, 755 Circle 75 Parkway, Suite 800, Atlanta, GA 30339.

Q. Please explain your role in this testimony.

We are testifying on behalf of the following natural gas marketers who are all intervenors in this proceeding: Gas South, LLC, Mansfield Power and Gas, SCANA Energy Marketing, LLC, SouthStar Energy Services LLC d/b/a Georgia Natural Gas, True Natural Gas, and Walton Natural Gas (" Marketer Group") in Atlanta Gas Light Company's ("AGL") 2025-2028 Capacity Supply Plan Hearing. We are a panel of witnesses and will respond to questions as set forth in the April 25, 2025 Procedural and Scheduling Order. Please note that the following Marketers also support this testimony that have not formally intervened in this proceeding: Constellation, Colonial Energy, Inc., Green Mountain Energy Company, Stream Energy Georgia LLC, and XOOM Energy Georgia LLC

Q. Summarize your general experience, education, and specifically your expertise in the field of natural gas production, transportation, and marketing.

I am **Paul Herron**, Director of Gas Supply for SCANA Energy Marketing, LLC. I work with a team that is responsible for forecasting demands, procuring supply, nominating/scheduling volumes, and managing customer imbalances, among other responsibilities. With our core markets being Georgia, South Carolina, and North Carolina, our team primarily transacts on the Southern Natural Gas, Elba Express, Transco, and Carolina Gas Transmission interstate pipelines. We also manage SCANA'S gas operations on multiple LDCs including Atlanta Gas

Light Company, Enbridge Gas North Carolina, Piedmont Natural Gas, and Dominion Energy South Carolina.

Prior to joining the SCANA team in 2013, I worked for Southern Natural Gas, a Kinder Morgan company at the time. I held various roles throughout my roughly 12 years with the company, with the latest being the Manager of Scheduling.

I graduated from the University of Alabama with a Bachelor of Science in Management Information Systems.

I am **Lori Smith,** Manager of Asset Optimization and Scheduling for True Natural Gas. In this capacity, I am deeply engaged in the daily operational aspects of natural gas, collaborating with the Gas Operations Team on scheduling, procurement, supply management, asset management, monthly planning, supplier engagement, and capacity release execution. I also work closely with key industrial and interruptible customers.

My utility career commenced in 1997 at a local power and water municipality, where I developed extensive expertise across a range of roles, culminating in the position as Business Relationship Manager. In 2012, I transitioned to the natural gas sector when I joined FireSide Natural Gas, assuming a role as Transportation Specialist and later Asset Manager, becoming adept at the complex daily management and scheduling of natural gas. I joined True Natural Gas in 2021.

I have a Bachelor of Business Administration degree from Kennesaw State University.

I am **David Wagner**, Vice President of Supply and Origination for Gas South, LLC. I am responsible for the acquisition and delivery of natural gas supply to all Gas South customers, including our AGL customer base, and for the development of new large industrial and other wholesale customers that complement Gas South's existing retail customer base. In this role, I oversee Gas South's management of gas transportation and storage assets for the 17 states in which we operate.

Before joining Gas South, I worked in similar roles for twenty years managing short term and long-term gas supply, transportation and storage needs of municipal gas systems, and for municipal and cooperative-owned electric companies.

I have a B.S in Food and Resource Economics and Masters of Agri-Business, both from the University of Florida.

Q. Have any of you previously testified before this Commission?

We have not previously testified before the Georgia Public Service Commission.

Q. What materials did you review in preparation for this testimony?

We reviewed the Pre-filed Testimony of Gregory Becker, the Minimum Filing Requirements ("MFRs"), the proposed array of interstate assets (the "Array"), and AGL's Answers to Staff's First and Second Set of Data Requests.

Q. Are you sponsoring any exhibits to your testimony?

Yes, the full list of exhibits to the testimony is as follows:

MG Exhibit No. 1: Current Discretionary On-System LNG
MG Exhibit No. 2: Least-Cost Dispatch Comparison
MG Exhibit No. 3: Cost-Effective, Risk-Mitigated Asset Stack Comparison
MG Exhibit No. 4: Marketer Recommended Plan for Discretionary On-System LNG
MG Exhibit No. 5: Trigger Thresholds for Transco-Dalton and Magnolia Assets
MG Exhibit No. 6: AGL Firm Load and AGL Proposed Asset Stack
MG Exhibit No. 7: AGL Firm Load and Marketer Proposed Asset Stack
MG Exhibit No. 8: Glossary of Terms

Q. What is your role in this proceeding?

We are testifying on behalf of the Marketer Group who serve 1.7 million Georgia natural gas customers. With that role in mind, our goal is to ensure that the regulated utility, Atlanta Gas Light Company ("AGL"), has developed a robust portfolio of gas supply deliverability assets, and that such assets are apportioned appropriately to provide a cost-effective, risk-mitigated supply solution that keeps natural gas a fuel of choice for Georgia customers.

Q. What is the Marketer role in bringing gas to Georgia customers?

Marketers partner with AGL to bring natural gas to AGL's system by utilizing the pipeline transportation and storage assets procured by AGL and allocated to Marketers to acquire supply and nominate such on the pipelines for delivery to the AGL city gate. Marketers purchase gas or

withdraw gas from storage and arrange for its transportation on an hourly and daily basis and do so in the quantities stipulated by AGL. In addition to using the AGL contracted assets, many Marketers have other assets at their disposal to be used to serve customers more cost effectively.

Q. State the purpose of your testimony.

The Marketers have significant concerns about AGL's proposed pipeline capacity and storage asset portfolio, and in particular, the proposed arrangement and allocation of such assets (the "Proposed Asset Stack").

Additionally, the operational characteristics of certain elements of the asset array (e.g., the removal of discretionary Marketer utilization of the on-system LNG asset) will increase risk and cost to Marketers, thus translating into customer prices that are higher than what they would have otherwise been without such modifications. AGL's proposed inventory swap of the on-system LNG inventory from Marketers to AGL in exchange for the Leaf River and SNG seasonal transportation capacity, are not comparable assets and Georgia customers will be harmed absent corrective modifications to the Proposed Asset Stack and the Marketers' access to discretionary on-system LNG assets.

Q. If you are opposed to AGL's Proposed Asset Stack, do you have an alternative proposal and if so, can you summarize it here?

Yes, we have an alternative proposal. The Marketer's proposal adopts as much of the AGL Proposed Asset Stack as feasible, with minimal modifications designed to balance the cost and risk impacts to Marketers and their customers. In summary, the Marketer plan would leave in place Marketers' existing rights to discretionary on-system LNG, which Marketers have maintained since the 2019 - 2022 Capacity Supply Plan[1] with (i) slight operational tweaks to integrate into the inventory swap structure being proposed by AGL, and (ii) adjustments to account for the increased LNG inventory and vaporization send out capabilities AGL continues to implement (i.e., discretionary rights would increase for Marketers over the period as AGL's send out capability increases).

[1] 2019 – 2022 Capacity Supply Plan Stipulation, page 8 of 27. Docket 42317.
2022 – 2025 Capacity Supply Plan Stipulation, page 17-18 of 32. Docket 44319.

Additionally, the Marketers' plan would keep the BPPSS asset at the top of the asset stack and move the Transco-Dalton asset to bifurcate the on-system LNG asset, similar to how the Magnolia asset is currently handled. There are other relatively minor clarifications and operational commitments from AGL that Marketers propose in its alternative, and these will be discussed in more detail later in the testimony.

Q. How is the remainder of the Marketers' testimony organized?

We have broken our testimony into three sections. The first will go into more detail on AGL's proposed inventory swap and why, while intended by AGL to increase customer reliability, the removal of Marketers' rights to discretionary on-system LNG will have a harmful effect on the Marketers' cost to serve, thus indirectly increasing overall utility costs to Georgians. The second section will expand on the Marketers' concerns with AGL's Proposed Asset Stack and why we view it as suboptimal when it comes to balancing risk and cost. Lastly, we will provide more details on the Marketers' alternative plan which makes reasonable modifications, for the benefit of customers, to the AGL Proposed Asset Stack.

Q. In preparation for the material you are about to present, are there key terms that are helpful to understand?

Yes. Given all the abbreviations and acronyms that are related to the Capacity Supply Plan have included a Glossary of Terms in MG Exhibit No. 8 for ease of reference.

Q. What is the Asset Array?

The asset array is the total collection of all AGL capacity assets and the priority of how they are used as demand for natural gas increases across the customer base.

Q. What are the components of the Asset Array and why is it also called the Asset Stack?

It is called an asset stack because the assets are stacked, from bottom to top. The ordering of the assets reflects how they are typically used, the bottom ones being dispatched more frequently, and the top one in case of low temperatures / high consumption. This order also follows the relative cost of the gas, for the most part, with the cheapest supply typically being sourced with the assets in the bottom part (which makes sense since these are used more often).

Q. How is the Stack ordered?

The first block is Firm Transportation (FT), transport capacity on the SNG and Transco pipelines. This block is available year-round (although the specific amounts vary across the seasons). This FT capacity is fully under Marketer control, and Marketers pay the pipelines directly for the reservation charges and other variable fees.

The next block is FINSS (Firm and Interruptible Nominated Sales Service), a sales service managed by AGL and provided to the marketers. It is composed of transportation and storage capacity which Marketers utilize in the winter only.

MARS (Marketer Accessible Retained Storage) is next in the stack. MARS is managed by AGL and used by the Marketers. AGL uses MARS as a swing asset to draw gas from or put gas into to absorb the differences between the forecasted and actual consumption, an essential function in the stack. In the winter, it is also used as a resource on cold days when the load gets to this level.

Then comes another piece of FT, similar to the first block, but this specific portion relates to the Transco Dalton expansion capacity which provides access to the Northeast resources. This capacity is placed higher in the stack because the supply is very expensive in the winter, though the capacity is available year-round.

Above Transco Dalton FT is another portion of MARS, the same asset described above but split into two parts for operational flexibility related to the FT Dalton placement.

Next is the second largest block of capacity, Liquified Natural Gas (LNG), which is used for peaking. This resource represents the three LNG plants owned, managed, and operated by AGL – Cherokee, Riverdale, and Macon. This block is available during the winter only, but more importantly, for limited number of days (at maximum capacity, only 7 days). The use of LNG is mixed (Marketers can schedule it if the inventory is above a certain target or AGL will use it on behalf of the marketers if the load is high enough). The LNG inventory belongs to the marketers, as we have to supply it throughout the summer as the tanks are filled up.

Then we have FT Elba/Magnolia which is firm transport capacity but is a special one designed to bring gas from the Elba Island LNG Terminal near Savannah. Natural gas sourced at Elba is brought south and then northwest to supply the Brunswick and Macon pools. It is placed this high up in the stack because gas at Elba competes with the global LNG market and can be very expensive.

At the top of the stack is BPPSS (Bundled Pipeline Peaking Sales Service). BPPSS is a service that has three storage components (Transco LGA, CovePoint LNG, and Bundled Peaking) and the associated transport capacity, backstopped by Dalton FT. BPPSS is available in the winter for up to 10 days, of which Marketers can call on the Cove Point LNG portion for up to 3 days.

SECTION 1.
REMOVAL OF MARKETERS' DISCRETIONARY RIGHTS TO ON-SYSTEM LNG

Q. AGL proposed a phased swap of inventory and related assets (on-system LNG for Leaf River and SNG transportation capacity) in its filing. Do the Marketers support this proposal?

As filed by AGL, no we do not. Marketers see the on-system LNG asset as part and parcel with the Marketers' rights to discretionary use of the on-system LNG. AGL's proposal to conduct the inventory swap is described in Gregory Becker's testimony that "Discretionary (economic) LNG access will be held at the levels in the 2022-2025 CSP, be ramped down through the transition period *and ultimately removed.*"[2] If the inventory swap leads to the removal of Marketers' discretionary access to on-system LNG, we do not support the AGL proposed swap.

Q. What are discretionary rights to on-system LNG, how do they work, and why are they so important to Marketers?

Normally, the on-system LNG assets function as a no-notice supply service for Marketers, meaning that once customer load reaches a level where the on-system LNG assets reside in the asset stack (i.e., a very cold winter day), Marketers' supply needs are automatically met with the on-system LNG supply. If a Marketer's inventory level of LNG meets certain percentage thresholds established by AGL at various milestone dates throughout the winter, that Marketer

[2] Pre-filed Testimony of Gregory Becker, page 57 of 61.

would have the right to nominate discretionary LNG for use to serve its customers as an alternative to the Marketer's other sources of supply on such day. This discretionary access to on-system LNG gives Marketers another flexible supply tool that can lower costs, and most importantly, mitigate both operational and financial risks faced by Marketers.

Q. What do you mean by mitigating operational and financial risks for Marketers?

Similar to AGL, the Marketers must serve gas supply to their customers on every day of the year. There are no excuses and no "mulligans." It is very common in the natural gas industry for the producers and pipelines that Marketers rely on for supply and transportation to AGL's delivery points to be impacted by events of Force Majeure that excuse them from performing their obligations to Marketers, with little to no consequence. Marketers are unable to "Force Majeure" our customers or our delivery obligations with AGL, and as such, we must deliver even when our counterparties are unable to deliver to us. The on-system LNG asset, and specifically the discretionary access, provides Marketers with the firm supply that ensures the customers' needs are met, and reduces the otherwise untenable financial consequence of the lost supply resulting from a Force Majeure event.

Q. What are the thresholds for Marketer's discretionary rights and why do they exist?

The thresholds, shown in MG Exhibit No. 1, function as a barometer for the adequacy of the LNG inventory to serve customers' needs over the remainder of the winter. If early-season cold results in high customer load and high use of the on-system LNG assets, it is likely that Marketers will lose their discretionary rights to LNG for some or all of the remaining winter season. However, if the start of winter is mild and the on-system LNG assets have been used only minimally, Marketers can use their discretionary rights to LNG to lower costs and mitigate the risks described above.

Q. Do Marketers have control over the amount of non-discretionary LNG used to serve customers?

Yes, indirectly. On days where customer load is high enough to reach the on-system LNG asset in the asset stack, Marketers may choose to bring additional supply to the AGL city gate from sources other than the on-system LNG assets in order to preserve their respective LNG inventory for use later in the winter season or to help retain their discretionary access.

Q. It sounds like the inclusion of the discretionary access to the on-system LNG asset actually creates alignment between AGL and Marketers to preserve LNG. Is that correct?

Yes, Marketers must meet the inventory threshold to have discretionary access so there is an incentive embedded in the current structure for Marketers to preserve their inventory. The primary difference between AGL and the Marketers on ideal LNG utilization centers around the Marketers' operational and financial risks assessment, whereas AGL is focused on their system operational risk only because it does not face the same risks Marketers face in their obligations to the customers described above.

Q. What is the right amount of discretionary access to on-system LNG for Marketers?

The current framework, as approved by this Commission, has worked very well for AGL, Marketers, and customers. As outlined in Gregory Becker's testimony, AGL has experienced ten of its top 25 all-time send out days in the past three winter seasons[3] and LNG inventories remained adequate for a Design Day scenario that could have occurred later in the season.

Q. Would the addition of the second tank at the Cherokee LNG plant or the forthcoming increases in liquefaction and vaporization at that location change your view of the discretionary rights to Marketers?

Yes, the increased LNG capability at Cherokee would have the effect of making more total inventory of LNG available for customers, as well as more peak day inventory available to customers, thus contributing to increased quantities of discretionary on-system LNG that can be made available for the benefit and Marketers and their customers.

Q. What about the incremental transportation capacity being proposed by AGL? Does that change your view of the discretionary rights to Marketers?

Yes, similar to how the increased capability at Cherokee should enable greater rights to discretionary LNG for Marketers, the sheer size of the incremental transportation capacity will greatly reduce the expected need for LNG to be used for customer load, thus enabling a greater quantity of LNG that should be made available for Marketers' discretionary access to benefit customers.

[3] Page 42-43 of 61, Pre-filed Testimony of Gregory Becker

Q. Can you elaborate on why the incremental transportation capacity should translate into greater discretionary LNG rights for Marketers?

Certainly. We assembled an illustration of the daily AGL firm customer demand and overlaid that with the AGL Proposed Asset Stack (see below). The AGL firm customer demand in the analysis was calculated by using the highest 100 days of demand during the winter of 2024/2025 and then escalating that load annually based on the load growth assumptions in AGL's CSP filing. While the 2024/2025 winter did not include a Design Day scenario, it was a significantly colder than normal January and included five of AGL's top ten send out days of all time. As such, we believe this is a very good representation of what winter demand will look like for the foreseeable future, provided AGL's forecasted load growth comes to fruition.

The analysis reveals that assuming the AGL Proposed Asset Stack, firm customer demand would require minimal use of the on-system LNG supply in the frequency and in the quantities detailed in the table below for the next six years.

	2026	2027	2028	2029	2030	2031
# of days load reaches on-system LNG threshold	5	6	5	2	2	2
Average daily LNG quantity (Dths)	115,010	115,118	96,823	85,036	105,559	126,062
Maximum daily LNG quantity (Dths)	283,730	308,880	275,064	145,971	167,078	188,166
Total seasonal LNG quantity (Dths)	575,051	690,707	484,113	170,073	211,118	252,125
Total seasonal LNG quantity (% of LNG storage capacity)	8%	10%	7%	2%	3%	3%

Q. Can you please explain what the data in the table tells us?

Yes. Starting with Year 1 of the CSP (winter 2025/2026 labeled as 2026 in the table above), using the AGL firm customer demand described above as evaluated for 2026, AGL would expect to need the on-system LNG asset to serve customers on only five days during the winter and for a total quantity of LNG that amounts to only 8% of AGL's total LNG inventory capacity. In Year 3 of the CSP (2028 above), the on-system LNG asset is needed only five times and amounts to only 7% of the total LNG inventory capacity.

Q. Can you please tie this back to the earlier question as to why the addition of the incremental firm transportation capacity should translate into greater quantities of discretionary on-system LNG available to Marketers?

Yes. The analysis clearly illustrates that, with the addition of the new pipeline capacity in the Proposed Asset Stack in 2028 and 2029, the expected utilization of the on-system LNG to serve customers is de minimis with only 7% of the inventory used in 2028 and only 2% of inventory used in 2029.

After the last of the new transportation capacity is incorporated in 2029, the AGL load growth will slowly increase the frequency and quantity of LNG necessary to serve firm customers. However, overall AGL's recommended placement of LNG in the asset stack will result in far less utilization of that resource. It is for these reasons, as supported by the data above, that the Proposed Asset Stack conserves LNG utilization and thus leaves a greater quantity available for Marketers' discretionary use.

Q. You stated that the load used in your analysis did not include a Design Day. What happens if AGL does experience a Design Day(s)? Doesn't AGL need to eliminate Marketers' discretionary access to on-system LNG in order to protect against extreme weather conditions?

The short answer is no. We incorporated the Design Day into the analysis and those results are shown in the table below. For each winter period, the table shows a maximum daily LNG utilization, and then various scenarios for cumulative seasonal LNG utilization shown as a percentage of total LNG inventory/capacity. The three scenarios are as follows: (i) if the peak load day was actually a Design Day, (ii) if the top two peak days were both Design Days, and (iii) if the top three peak days were all three Design Days.

	2026	2027	2028	2029	2030	2031
Maximum daily LNG quantity (Dths)	906,219	940,010	937,429	815,641	843,939	872,315
Total seasonal LNG quantity (%) if 1 peak day was Design Day	16%	18%	16%	12%	12%	13%
Total seasonal LNG quantity (%) if 2 peak days were Design Days	27%	28%	27%	22%	23%	24%
Total seasonal LNG quantity (%) if 3 peak days were Design Days	38%	41%	39%	35%	36%	37%

Q. Can you please explain what the data in the table tells us?

Focusing on Year 1 again of the CSP (2026), if AGL had experienced one or more Design Days, the maximum daily on-system LNG use would have been 906,219 Dths. This is within the 1,104,500 Dths total on-system LNG capability stipulated by AGL for that year. Additionally, if AGL's highest load day had been a Design Day with increased LNG utilization, AGL's total use of LNG for the winter season, as a percentage of its total on-system LNG capacity, would have been 16% versus the 8% of LNG capacity utilized in the original table without the assumption of a Design Day. When we increase the number of Design Day occurrences from one to two and then from two to three, we increase the total winter utilization of LNG from 16% to 27%, and then ultimately to 38% with the assumption of three Design Days.

Q. To be clear, are you saying that even with the assumption that you increased the evaluated load on three occurrences each winter to match the Design Day load forecasted by AGL, no more than 41% of the total LNG inventory would be used in an entire winter season to serve firm load for the foreseeable future?

That is correct. Based on the AGL filed Proposed Asset Stack, which moves on-system LNG assets to the top, removes Marketers' discretionary LNG access, and adds 275,000 Dths/day of incremental firm transportation capacity, even multiple occurrences of a Design Day load do not place undue strain on the availability of the on-system LNG asset. This is why Marketers feel strongly against the costs and risks to be transferred to Marketers through AGL's proposed inventory swap and subsequent elimination of Marketers' discretionary rights to the on-system LNG asset.

SECTION 2.
SUBOPTIMAL PROPOSED ASSET STACK

Q. How does the asset stack factor into creating a reliable system?

As Gregory Becker states in his testimony, "the primary objective of the CSP is to ensure that the selected Array will be sufficient to provide safe and reliable service to AGL's firm customers

for the upcoming three-year period."[4] Marketers agree that we must have a system that is reliable, with enough assets to serve customers on a design day(s), and that AGL must have access to those assets when needed. Moreover, the Array should be prudently acquired to balance the deliverability of each asset (i.e., is it utilized for design-day(s), for the peak 5 to 10 days, as baseload throughout the winter period) against the cost of such asset.

Q. What is the Asset Array?

The asset array is the total collection of all AGL capacity assets and the priority of how they are used as demand for natural gas increases across the customer base. The sum of these assets is what is needed to serve firm retail customers and include firm distribution service, interstate transportation and storage services. Assets in this stack are allocated to Marketers based upon the Dedicated Design Day Capacity requirements of the Firm Retail Customers served by each Marketer.

Q. Where does reliability and cost factor into the composition and prioritization of the asset array?

Reliability is critical, but there is a point where there is a diminishing return if the cost for that reliability exceeds what customers can afford to pay. Assets are prioritized so that the more expensive ones are available to use when the demand is greatest, thus mitigating costs to customers on a regular basis.

Q. How should this Commission determine what the balance is between reliability and cost?

In traditional electric utility frameworks, companies use the Value of Lost Load ("VOLL") to estimate the economic impact of power outages on customers. Utilities use VOLL to determine how much customers are willing to pay to avoid outages. Higher VOLL values justify more investment in reliability. The same principle is at work when AGL forecasts and proposes the assets for a CSP.

After a VOLL is determined, utilities assess the incremental cost of reliability improvements against the incremental benefits. This involves evaluating the cost of additional infrastructure or

[4] Page 16 of 61, Becker Pre-filed Testimony

maintenance against the reduction in outage frequency and duration with the goal of ensuring that there are sufficient resources to meet demand without excessive investment. This includes maintaining reserve capacity and redundant systems to handle contingencies.

It is then the Commission's role to balance reliability and cost, reviewing proposals for and ensuring that costs are justified and customers are not overburdened. Finding the right balance involves continuous assessment and adjustment based on changing conditions and customer needs. It is a dynamic process that requires collaboration between utilities, regulators, and customers.[5]

Collaboration is critical to making the best decisions for Georgia customers.

Unfortunately, AGL has repeatedly declined to collaborate and even discuss key issues with Marketers within the Commission Ordered Marketer Working Group. Marketers presented two pages of key issues with proposed solutions in May 2025, hoping to partner with AGL early on to best meet the needs of the utility and the customers. After three months, AGL finally responded on August 5th, 2025, long after the filing of their plan. Providing the Commission with a one-sided plan that does not consider the Marketers perspectives and data is not in the best interest of Georgia ratepayers.

Q. Where is the balance between reliability and cost?

Reliability is critical, but as noted above, there is a point where there is a diminishing return if the cost for that reliability exceeds the value the customer receives from the inclusion of such. Additionally, excessive costs can result in the natural gas product itself becoming uncompetitive with alternative forms of energy, and in the worst case, result in a product that customers cannot afford.

Q. Specifically, what concerns do you have with AGL's Proposed Asset Stack?

Marketers are deeply concerned that the proposed incremental firm pipeline capacity combined with the hierarchy of the asset stack, produce a higher cost dispatch of resources to serve

[5] The Brattle Group, *"Finding the Balance Between Reliability and Cost: How Much Risk Should Consumers Bear?"* by William Zarakas and Johannes Pfeifenberger.

customers, resulting in higher price for customers, that far outweighs any perceived reliability benefits.

Q. Can you please expand on what you mean when you state that the dispatch of resources produces a higher cost for customers?

Certainly. As shown in Exhibit MG No. 2, the assets are identified in order (cheapest on bottom) that reflect the relative marginal cost of the supply associated with each bucket *during a cold winter day*. Next to that table are the same assets shown in the order of AGL's Proposed Asset Stack (first dispatched on the bottom, last dispatched on the top).

In AGL's Proposed Asset Stack, there are numerous assets that will require utilization by Marketers to serve customers that are not being "dispatched" in the least-cost first economic framework. While we do not expect the asset stack to be perfectly dispatched under all conditions, the key anomalies that will drive costs higher for customers are highlighted in MG Exhibit No. 2 and listed below:

1. AGL's requirement that the Transco-Dalton asset be dispatched as part of the FT released to Marketers instead of moving it higher in the asset stack to reflect the increased cost.

2. AGL's proposal to move the on-system LNG asset to the top of the asset stack[6], thus requiring the dispatch of the more expensive BPPSS asset first.

3. SNG-Magnolia trigger at only 550,000 Dths of projected system LNG sendout, thus requiring an overly conservative early dispatch of the more expensive Magnolia asset and related supply.

Q. Are there legitimate reasons for AGL to deviate from a least-cost dispatch of the asset stack?

To a certain degree, yes. Certain assets have a finite amount of gas supply that once exhausted, means those particular assets will no longer be available to serve customers. The on-system LNG and the BPPSS are the two such assets that meet this criterion and as such, should be

[6] Pre-filed Testimony of Gregory Becker, page 57 of 61.

evaluated in the light of that risk. Otherwise, there is no reason or benefit that would justify establishing assets outside of the least-cost dispatch framework.

Q. Based on your earlier comments, it sounds like you believe that AGL's Proposed Asset Stack does not provide the most "cost-effective, risk mitigated" solution to serve the customers. Is that correct?

Yes, that is correct. Requiring Marketers to deliver the high-cost Transco-Dalton asset so early in the asset stack unnecessarily adds cost to Marketers and customers. Also, moving the on-system LNG asset to the top of the stack, combined with eliminating the Marketers' discretionary rights, prevents Georgia customers from realizing any of the economic benefits of the LNG asset that they are paying for.

Q. Do the Marketers have an alternative asset stack to propose?

Yes. As mentioned earlier in the summary of our testimony, we have made every effort to adopt most of the AGL proposal while offering specific modifications that will provide benefits to customers and maintain the system reliability that AGL is seeking. The asset stack as proposed by the Marketers is detailed in Section 3 below.

SECTION 3.
MARKETERS' ALTERNATIVE PROPOSAL

Q. You indicated in prior responses that the Marketers have an alternative proposal to address their concerns. Can you please walk me through that alternative proposal?

Yes. As previously mentioned, despite concerns with various aspects of AGL's Proposed Asset Stack, the Marketers have intentionally worked to address these issues with precise and relatively minor modifications to the overall AGL proposal. If adopted by the Commission as presented by Marketers, this solution would provide AGL with the key elements that they are seeking (e.g., the inventory swap, increased SNG no-notice MARS, incremental FT service), while mitigating some of the adverse effects on costs that customers would otherwise absorb. From a cost-effective, risk-mitigated standpoint, MG Exhibit No. 3 compares the Marketer proposed asset stack to the least-cost stack, and the AGL Proposed Asset Stack.

The proposed modifications to the AGL filed plan are as follows:

1. Continue Marketer Discretionary on-system LNG access indefinitely with no phase-out.
    a. Modify thresholds to those shown on Exhibit 4 effective 12/1/2026 forward.
    b. For the purpose of calculating each Marketer's percentage of inventory, the denominator used will be equal to the actual inventory realized by AGL as of December 1st of each year and adjusted monthly for any changes in Marketers' market share.

2. Beginning in Year 3, carve out the Marketers' portion of the Transco-Dalton FT asset and move it to a location in the asset stack that bifurcates the on-system LNG asset, similar to Magnolia. The Marketer proposed trigger thresholds would be set to match the quantity of incremental firm transportation capacity added by AGL as proposed in its filing (e.g., 125,000 Dths in 2028, 275,000 Dths in 2029 forward). This change, and the magnitude thereof, would be contingent on the in-service of the incremental firm transportation capacity filed by AGL for such year. The proposed trigger thresholds for Transco-Dalton, along with the Magnolia asset, are included as MG Exhibit No. 5.

3. Modify the on-system LNG thresholds for the Magnolia asset as shown in Exhibit No. 5 and retain the limit of ten (10) days per season that AGL may call on Marketers to deliver such supply.

4. Move the BPPSS asset to the top of the asset stack. This would simply continue the dispatch of this resource as it currently exists.

Q. You provided analysis earlier that showed minimal projected utilization of the on-system LNG asset based on the AGL Proposed Asset Stack. What would the on-system LNG utilization look like if the Commission adopted the Marketers' proposed modifications?

The table below illustrates the same analysis as above in Section 1 of our testimony, but with the assumptions modified to reflect the Marketers' proposed modifications.

	2026	2027	2028	2029	2030	2031
# of days load reaches on-system LNG threshold	8	8	13	8	8	9
Average daily LNG quantity (Dths)	199,640	221,792	246,899	725,782	790,179	858,357
Maximum daily LNG quantity (Dths)	445,353	470,503	436,687	307,594	328,701	349,789
Total seasonal LNG quantity (Dths)	1,597,121	1,774,336	1,975,189	1,451,564	1,580,359	1,716,715
Total seasonal LNG quantity (% of LNG storage capacity)	22%	24%	27%	20%	22%	24%

Q. Would you please summarize the results?

Yes. As expected with the Marketers' proposal, both the frequency of on-system LNG utilization and the quantity of LNG use both increase versus the AGL Proposed Asset Stack. However, under the colder than normal winter weather conditions used in the analysis, the total winter use of LNG averages only 23% of inventory capacity over the six-year period, with a maximum use of 27% of inventory capacity used in 2028.

Q. Is there an easier way to visualize this comparison of the on-system LNG use under the AGL Proposed Asset Stack versus the Marketers' proposal?

Yes. MG Exhibit No. 6 contains a chart showing the AGL load used in the analysis overlaid with the AGL Proposed Asset Stack. There is a chart for the year 2026, and then one for 2029, after all the incremental firm transportation capacity has gone into service.

Exhibit No. 6 contains the same charts for 2026 and 2029 but with the Marketers' proposed asset stack for each year.

Q. Please summarize those key changes in the Marketers' proposal?

Absolutely. We are proposing to (i) move the firm transportation (FT) agreements associated with the most expensive supply in the winter, Magnolia and Transco-Dalton, to a higher location in the asset stack, (ii) move the BPPSS asset to the top of the asset stack as it currently resides, and (iii) continue Marketers' access to discretionary on-system LNG with adjustments to the inventory thresholds.

Q. The move of the Transco-Dalton asset to higher in the asset stack seems like a departure from how the parties have been treating that asset over time and a departure from AGL's stated position of intent noted in the prior CSP Stipulation. Why does the Marketers' proposal make sense now?

We recognize that there is language in the 2022-2025 CSP Stipulation that the marketers were provided notice that "AGL intends to file zero (0) in the 2025-2028 Capacity Supply Plan and end this provision."[7] While the Marketers acknowledged in 2020 that AGL had stated its intent to end this provision in the 2025-2028 CSP, the Marketers did not agree that they would support this change. Moreover, since the Stipulation was adopted there has been a material change of circumstances which warrants adoption of the Marketers' Proposal. This modification would result in more efficiency and cost savings for marketers and customers across Georgia.

The reason this modification makes sense now is because of the addition of the new firm transportation capacity being proposed by AGL combined with the increase in on-system LNG capacity and vaporization being implemented. Although the gas supply is expensive, particularly on peak days, the Dalton asset was lower in the asset stack up to this point because it made sense in balancing the cost-effectiveness with the risk mitigation of the supply solution for the AGL system. If the AGL plan is adopted and the incremental capacity goes into service, the cost and risk equation changes significantly and it would be appropriate to move that asset in the dispatch stack.

Q. How does the Marketers' proposed change in the Dalton asset sync with the notion of preserving LNG to support the Marketers' request for discretionary rights?

As discussed earlier, on high-load days that necessitate the use of on-system LNG in the asset stack, Marketers have the ability to bring additional supply to the AGL system to effectively reduce the LNG utilized for that day for their customers and preserve it for a future day(s). Although moving the Dalton asset higher in the stack would translate into earlier use of on-system LNG, Marketers can still bring the Dalton supply on any day where LNG is anticipated to be required in order to preserve their LNG inventory for future use. The Marketers' proposed plan to continue discretionary LNG combined with the change to the Dalton actually harmonize quite well and give the Marketers the choice to use Dalton based on their cost and risk

[7] CSP 2022-2025 Stipulation and Joint Pre-Filed Testimony, page 3. Docket 44319.

assessment, without being forced to use Dalton out of economics based on the AGL proposed location in the asset stack.

Q. Please discuss the scenarios where you include the assumption of Design Day demand?

Of course. As shown in the table below, the total seasonal LNG use reflects the increase in supply on those assumed Design Days, thus increasing the total usage to a higher portion of the available inventory capacity. In the case of a single Design Day adjustment in the analysis, the LNG utilization is 32% of inventory capacity over the six-year period, with the highest use of 36% in 2028. Assuming three Design Day occurrences would increase those utilization values to 55% average and 60% peak.

	2026	2027	2028	2029	2030	2031
Maximum daily LNG quantity (Dths)	1,067,842	1,101,633	1,099,052	977,264	1,005,562	1,033,938
Total seasonal LNG quantity (%) if 1 peak day was Design Day	31%	33%	36%	29%	31%	33%
Total seasonal LNG quantity (%) if 2 peak days were Design Days	41%	43%	47%	40%	42%	44%
Total seasonal LNG quantity (%) if 3 peak days were Design Days	53%	55%	60%	53%	55%	57%

Q. If the Marketers are recommending the changes to the asset stack that would increase the use of on-system LNG under the conditions used in your analysis, how would you respond to the argument that the Marketers' proposal is too risky and relies too heavily on the on-system LNG?

First, the data show that use of the LNG on up to 13 days of the winter of 2028, and 8 to 9 days in the other five years, is consistent with prudent utility planning and the design of the facilities (i.e., the facilities are designed to provide 5-10 days of service of maximum daily withdrawal). Second, use of less than one-quarter of the total inventory capacity in a given season, assuming colder than normal weather conditions, is by no means pushing the risk envelope. Third, even after incorporating a scenario where three separate Design Day demands were realized, an extreme situation during which the on-system LNG would be expected to carry a heavy supply load, the average use of just more than one-half of the inventory capacity over the evaluation period leaves margin to spare, and that assumes AGL had no opportunity to liquefy to replenish LNG inventory during the winter season. And lastly, in the analysis using the Marketer's proposal the BPPSS asset was never utilized, meaning there is additional LNG inventory and

related assets available for further risk mitigation. In the tension of cost vs. reliability, we believe the Marketers' proposed modifications bring significant value to customers, without placing undue risk on AGL or its system.

Q. Is there anything else the Marketers are requesting?

Yes, there are some items that Marketers would like the Commission to direct AGL to clarify in the Commission's order in this proceeding. AGL's proposal was not in opposition to the items below, but it was silent and therefore the Marketers are left with uncertainty.

The Marketers request that the Commission Order include the following clarifications and details to complement the plan proposed by AGL.

1. The Marketers request that the Commission order AGL to implement the swap of NFG for MARS/SNG Storage in such a way that results in AGL retaining the SNG CSS and FT-NN capacity with primary delivery points delivering to any combination of the five SNG North Line points for the Atlanta Pool.

2. The Marketers request that the Commission direct AGL to publish an HDD forecast on its website for Marketers that will be the same value used by AGL to determine the allocation of space available to Marketers at the five SNG North Line delivery points to the Atlanta Pool.

3. The Marketers have concerns about the lack of specificity on the USF issue raised in Gregory Becker's testimony[8] that could result from AGL's filed plan. Specifically, Marketers request that the Commission direct AGL to clarify (a) how AGL intends to determine if and to what extent any adverse impacts would occur to the USF should AGL implement its proposed changes as filed, and (b) how AGL would remedy such impacts going forward.

[8] Pre-filed Testimony of Gregory Becker, page 58 of 61.

4. The Marketers have concerns about the lack of specificity regarding the potential IT system upgrades AGL believes may be required[9] if it implements its filed plan. Specifically, the Marketers request that the order direct AGL to provide clarification on the scope of the project, the estimated cost and timeline to implement, and the value and necessity of such IT upgrades[10].

5. The Marketers have concerns about the lack of specificity regarding the potential pipeline capacity that AGL indicated in Gregory Becker's testimony[11] it would need to retain to support "summer refill periods as well as potential winter liquefaction needs" if the AGL plan for the inventory swap is approved. Specifically, the Marketers request that the order direct AGL to provide clarification on the term, quantity, pipeline, and specific packages of firm transportation capacity, whether existing capacity or the incremental capacity being sought here by AGL, and any other details related to AGL's perceived need.

6. The Marketers request that AGL be ordered to provide a right of first refusal (ROFR) to the Marketer community should any existing storage, pipeline, or similar capacity under contract by AGL be sold into the secondary marketplace in the future.

Q. For your item #1 above (related to the NFG for MARS/SNG swap), why is it important that this detail be included in the approved CSP?

Beginning in the fall of 2023, AGL implemented restrictions on Marketers' ability to deliver gas to serve customers at those five specific delivery points on SNG due to what Marketers understand is an operational inability for AGL to receive physical gas at those locations except for high load conditions. This has essentially left the Marketers with a stranded asset as AGL allocates firm transportation capacity to Marketers that delivers to those points. One way to mitigate the harmful impact to Marketers and customers of this operational issue is to reduce the

[9] Pre-filed Testimony of Gregory Becker, page 58-59 of 61.
[10] Pre-filed Testimony of Gregory Becker, page 56 of 61.
[11] Pre-filed Testimony of Gregory Becker, page 53 of 61.

amount of that stranded asset that is allocated to Marketers. If AGL retains this specific capacity as part of the swap, it brings the aforementioned benefit.

Q. For your item #2 above (related to the publishing of HDDs), why is it important that this detail be included in the approved CSP?

This need is also related to the SNG North Line issue described in the prior response. Because AGL can only accept gas at those points under high load days (i.e., cold days with meaningful HDDs), AGL's current business practice is to restrict gas quantities from Marketers at those points on days that do not reach the HDD threshold established by AGL and the Marketers. To communicate with Marketers whether they can deliver some, or all, of the allocated capacity to those North Line Delivery points, AGL publishes an HDD value on its website. The Marketers simply want to ensure that the HDD value posted will be the official value utilized by AGL to determine North Line available quantities, so that Marketers can make their gas supply plans with certainty.

Q. For your items #3 through #5 above, why is it important for Marketers to have additional detail on these items?

Without specifics, Marketers and ultimately customers could face additional costs and/or increased risks through these items. The more details that are available to Marketers, the lower the uncertainty and risk, and the more competitive rates can be for customers. Given the magnitude of the inventory swap proposal from AGL, the lack of clarity on details creates a great deal of uncertainty and risk for Marketers and customers.

Q. For your item #6 above, why is it important for Marketers to have a right of first refusal when AGL determines that it is going to remove those sorts of capacity rights from the asset array and sell or release them to third-parties?

Those assets may have as much, or more value to Marketers than what AGL is able to achieve in the marketplace. These types of assets, although determined by AGL to be unnecessary for the system, may be relied upon by Marketers to serve their long-term portfolio of customers and thus Marketers may place the highest value on securing such assets long-term.

Q. Can you please provide a summary of your testimony?

Yes. The Marketers have significant concerns about AGL's proposed pipeline capacity and storage asset portfolio, and in particular, the proposed arrangement and allocation of such assets. The removal of Marketers' discretionary access to the on-system LNG assets, along with the forced use of the Dalton asset prematurely in the asset stack, will increase risk and cost to Marketers, thus translating into higher customer prices. The Marketers are presenting relatively small modifications to the AGL proposal that, if adopted by the Commission, would provide AGL with the key elements that they are seeking (e.g., the inventory swap, increased SNG no-notice MARS, incremental FT service), while mitigating some of the adverse effects on costs that customers would otherwise absorb.

The Marketers' key changes are to (i) move the firm transportation (FT) agreements associated with the most expensive supply in the winter, Magnolia and Transco-Dalton, to a higher location in the asset stack set, (ii) move the BPPSS asset to the top of the asset stack as it currently resides, and (iii) continue Marketers' access to discretionary on-system LNG with adjustments to the inventory thresholds. We believe the AGL proposal, with the Marketers' modifications, provides all stakeholders with an appropriate balance of cost-effectiveness and risk-mitigation.

Q. Does this conclude your testimony?

Yes.

MG EXHIBIT NO. 1

Current Discretionary On-System LNG

	Current Atlanta	Current Macon
1-Dec	95%	95%
15-Dec	95%	95%
1-Jan	80%	80%
15-Jan	70%	60%
1-Feb	50%	40%
15-Feb	30%	20%
1-Mar	15%	10%
15-Mar	10%	10%
April 1 – Nov 30	0%	0%

MG EXHIBIT NO.2

Least-Cost Dispatch Comparison

Least Cost Dispatch	
$$$$	Pipeline FT - Magnolia
$$$$	Pipeline FT - Dalton
$$$	BPPSS
$$	On-System LNG
$	FINSS
$	MARS
$	Pipeline FT (traditional flow)

AGL Proposed Asset Stack	
$$	On-System LNG
$$$$	Pipeline FT - Magnolia
$$	On-System LNG
$$$	BPPSS
$	FINSS
$	MARS
$$$$	Pipeline FT - Dalton
$	Pipeline FT (traditional flow)

MG EXHIBIT NO. 3

Cost-Effective, Risk-Mitigated Asset Stack Comparison

Least Cost Dispatch	
$$$$	Pipeline FT - Magnolia
$$$$	Pipeline FT - Dalton
$$$	BPPSS
$$	On-System LNG
$	FINSS
$	MARS
$	Pipeline FT (traditional flow)

AGL Proposed Asset Stack	
$$	On-System LNG
$$$$	Pipeline FT - Magnolia
$$	On-System LNG
$$$	BPPSS
$	FINSS
$	MARS
$$$$	Pipeline FT - Dalton
$	Pipeline FT (traditional flow)

Marketer Proposed Asset Stack - Before addition of new FT	
$$$	BPPSS
$$	On-System LNG
$$$$	Pipeline FT - Magnolia
$$	On-System LNG
$	FINSS
$	MARS
$$$$	Pipeline FT - Dalton
$	Pipeline FT (traditional flow)

Marketer Proposed Asset Stack - After addition of new FT	
$$$	BPPSS
$$	On-System LNG
$$$$	Pipeline FT - Magnolia
$$	On-System LNG
$$$$	Pipeline FT - Dalton
$$	On-System LNG
$	FINSS
$	MARS
$	Pipeline FT (traditional flow)

MG EXHIBIT NO. 4

Marketer Recommended Plan for Discretionary On-System LNG

Current

	Current Atlanta	Current Macon
1-Dec	95%	95%
15-Dec	95%	95%
1-Jan	80%	80%
15-Jan	70%	60%
1-Feb	50%	40%
15-Feb	30%	20%
1-Mar	15%	10%
15-Mar	10%	10%
April 1 – Nov 30	0%	0%

Effective 12/1/2026 Forward

	Proposed Atlanta	Proposed Macon
1-Dec	95%	95%
15-Dec	95%	95%
1-Jan	75%	65%
15-Jan	55%	50%
1-Feb	45%	35%
15-Feb	30%	20%
1-Mar	30%	20%
15-Mar	30%	20%
April 1 – Nov 30	n/a	n/a

MG EXHIBIT NO. 5

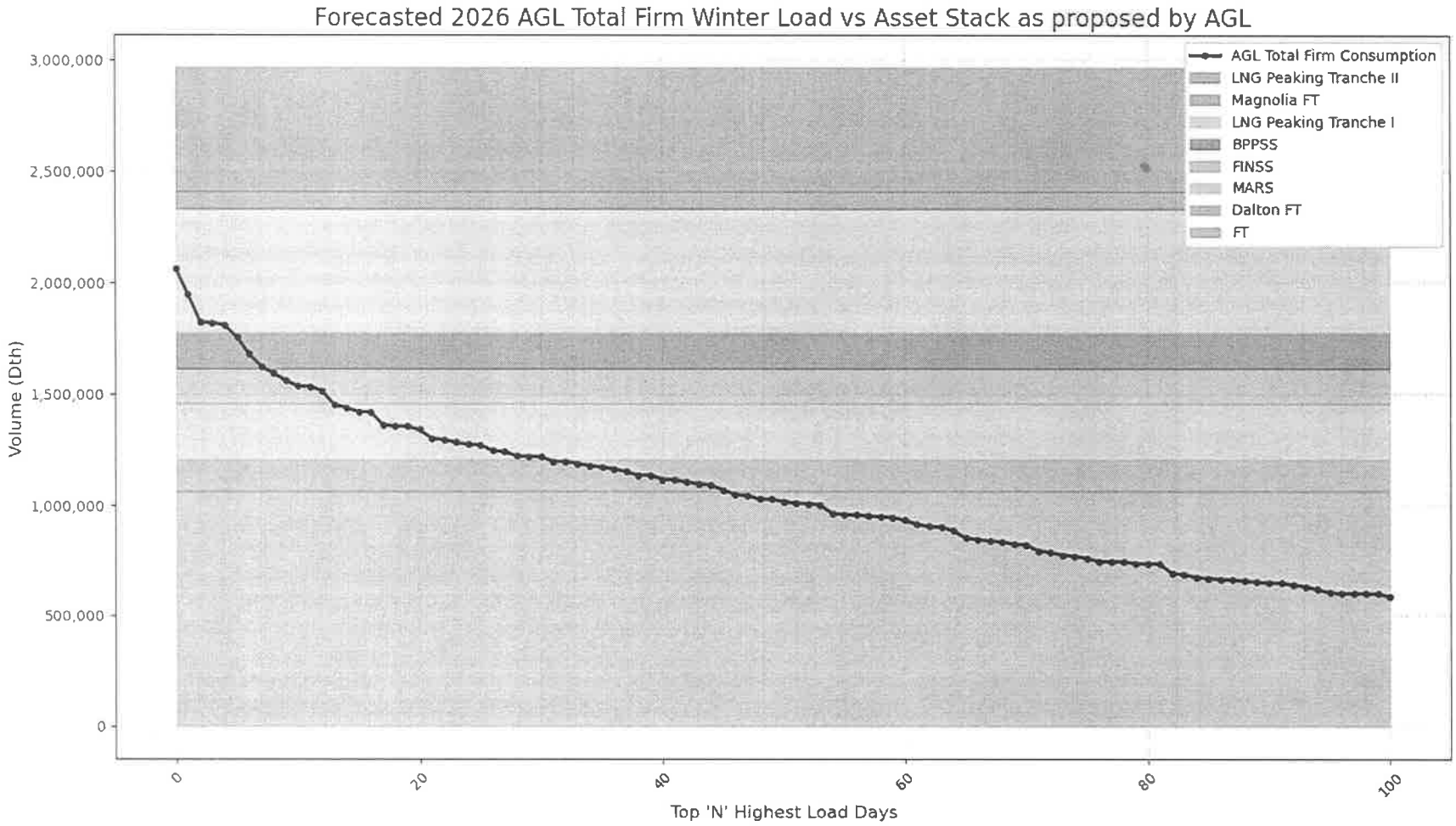
On-System LNG Sendout Trigger Thresholds for Transco-Dalton and Magnolia Assets

Marketer Proposed Trigger Thresholds for Transco-Dalton and Magnolia

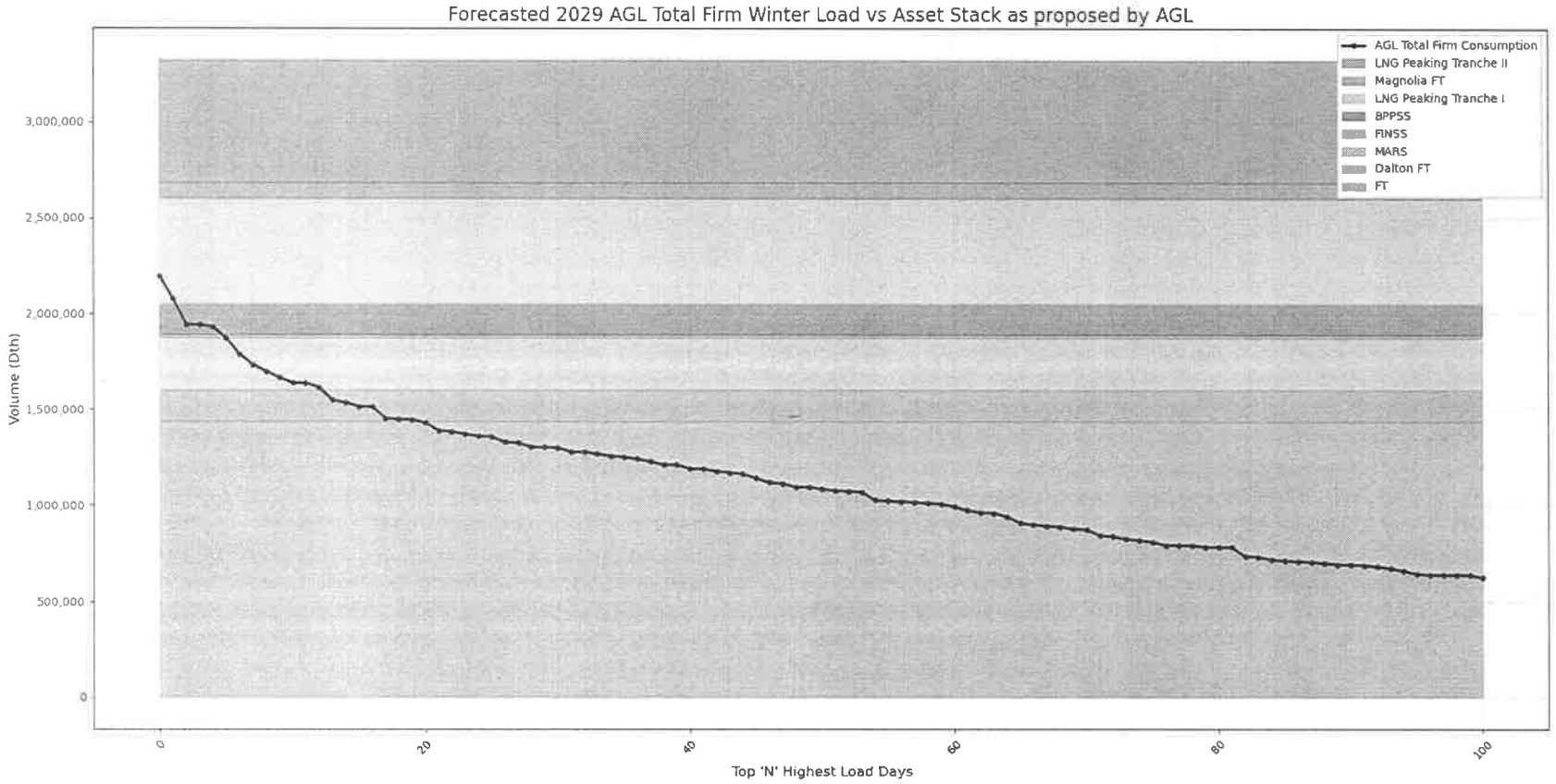
	Asset	2026	2027	2028	2029	2030	2031
Forecasted on-system LNG Utilization	Transco-Dalton	n/a	n/a	125,000	275,000	275,000	275,000
	Magnolia	550,000	590,000	630,000	960,000	960,000	960,000

MG EXHIBIT NO.6

AGL Firm Load and AGL Proposed Asset Stack

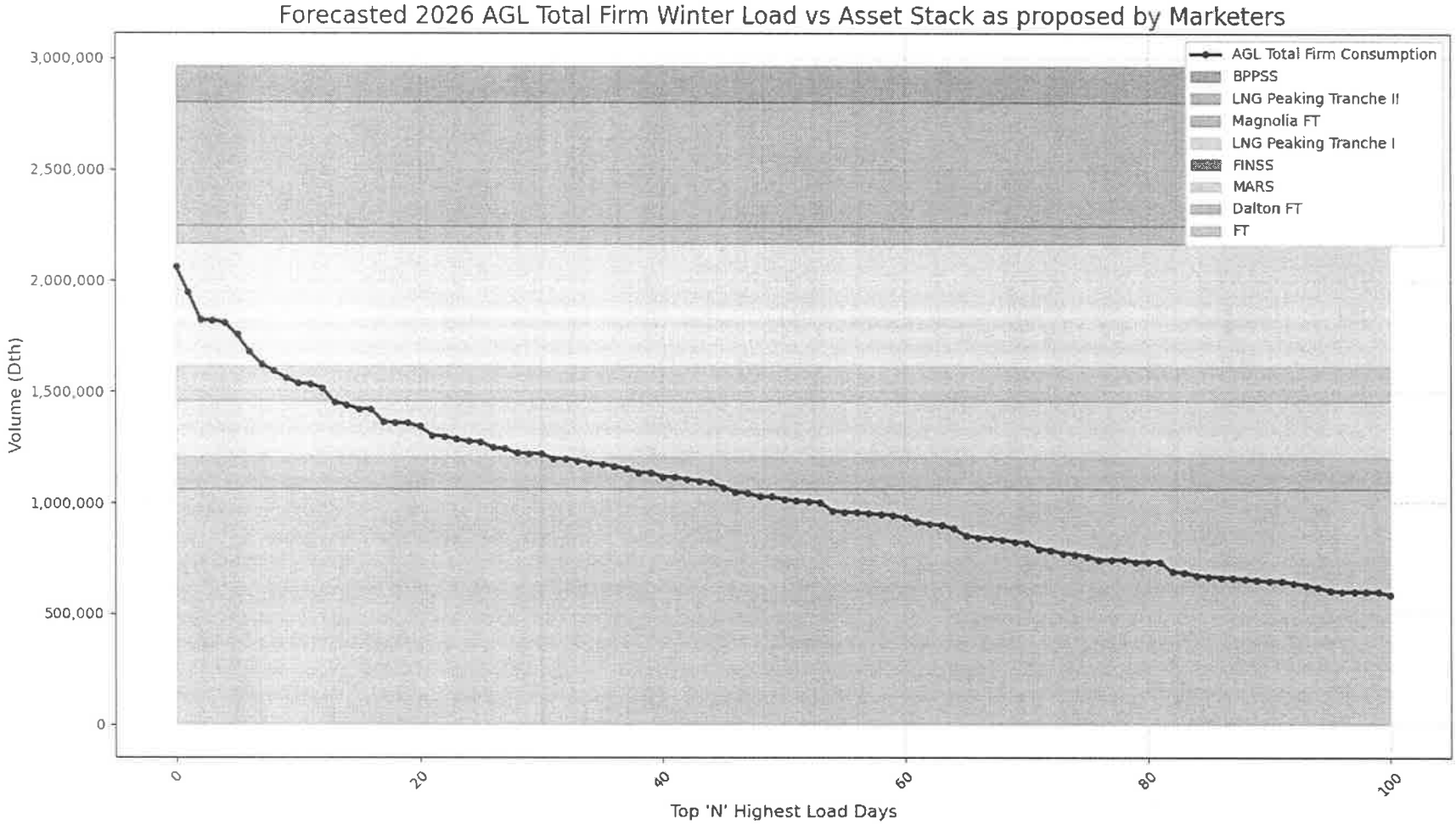


MG EXHIBIT No. 6 (con't)

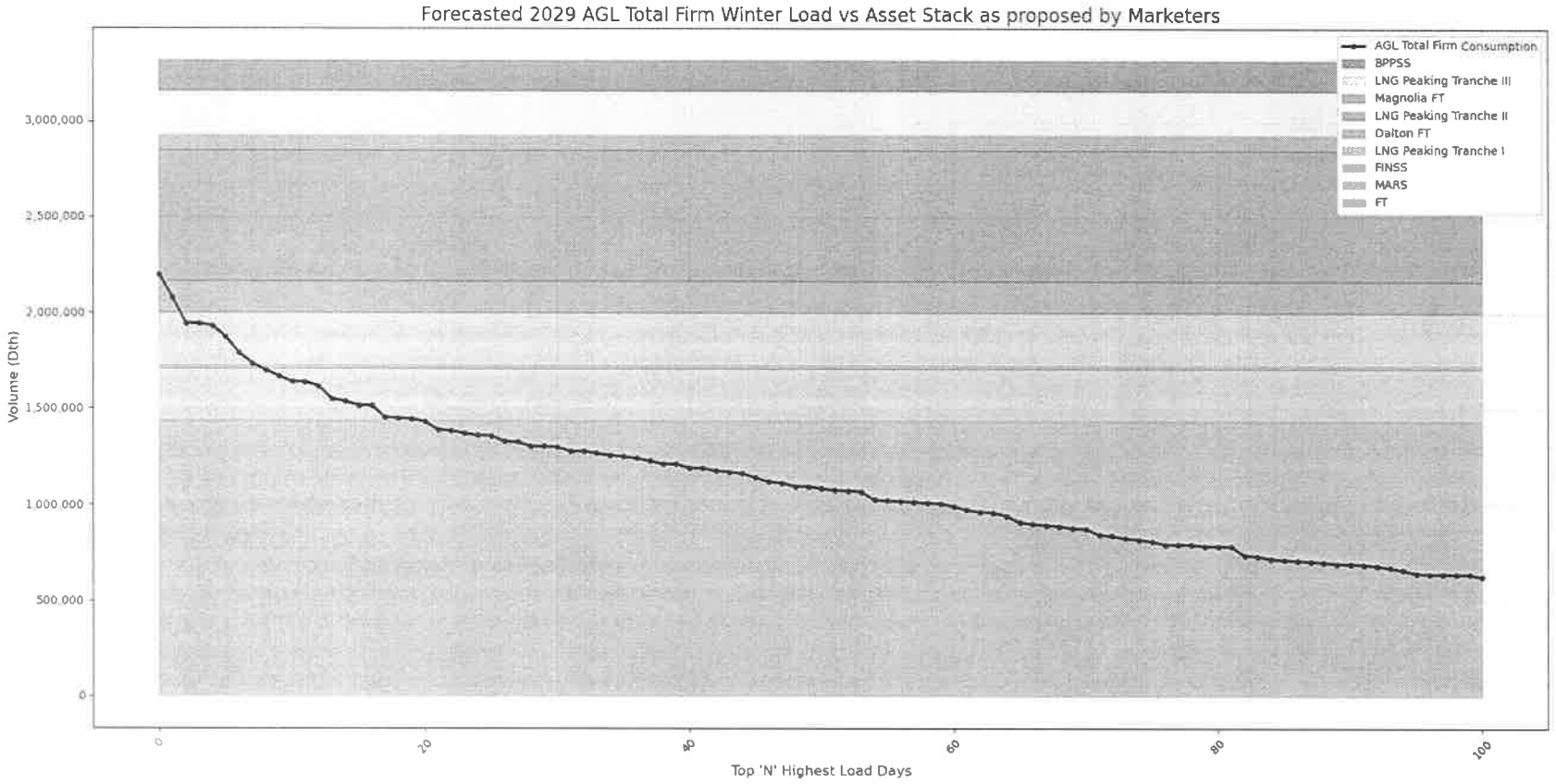


MG EXHIBIT NO. 7

AGL Firm Load and Marketer Proposed Asset Stack


Forecasted 2026 AGL Total Firm Winter Load vs Asset Stack as proposed by Marketers
AGL Total Firm Consumption
BPPSS
LNG Peaking Tranche II
Magnolia FT
LNG Peaking Tranche I
FINSS
MARS
Dalton FT
FT
Volume (Dth)
3,000,000
2,500,000
2,000,000
1,500,000
1,000,000
500,000
0
0
20
40
60
80
100
Top 'N' Highest Load Days

MG EXHIBIT No. 7 (con't)



MG EXHIBIT No. 8

Glossary of Terms

Design Day: A hypothetical Gas Day (24-hour period starting at 10:00am ET) assumed to have a certain average temperature for the purposes of designing and determining the capacity needs of a system. The current temperature criteria used by AGL is 10°F (equivalent to 55 HDDs) for the Atlanta pool group.

Discretionary: In the context of this testimony, the optional use of an asset from the Asset Stack by a Marketer (as opposed to No Notice) that is not required to meet firm service obligations.

Firm Transportation (FT): Primary firm transportation capacity on interstate pipelines that is allocated to Marketers as part of the Asset Stack.

Heating Degree Day (HDD): Measure used to estimate energy demands. It represents the number of degrees, if any, the average temperature on a day falls below a base value of 65°F. In other words, if the average temperature is 65°F there are no HDDs, otherwise the HDDs will be 65 minus the average temperature.

No-Notice Service: This refers to a type of firm transportation service where the shipper (or Marketer) can receive or deliver gas without providing prior scheduling notice to the pipeline operator (or AGL).

On-System: On-system use refers to the utilization of assets (in this case LNG storage tanks at Cherokee, Macon, and Riverdale) that are within an LDC/EDC (AGL's) own network or infrastructure.

Peak Day: The highest demand Gas Day of a winter heating season.

Send Out: Delivery.

BEFORE THE PUBLIC SERVICE COMMISSION

STATE OF GEORGIA

IN RE:	}	
ATLANTA GAS LIGHT COMPANY'S	}	**DOCKET 56177**
2025-2028 CAPACITY SUPPLY PLAN	}	

DIRECT TESTIMONY OF PAUL HERRON, LORI SMITH, DAVID WAGNER

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SouthStar Energy Services, dba
Georgia Natural Gas

Brett Newsome, VP of Regulatory
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Leslie Marler, President
True Natural Gas

Jim Bottone, SVP
Walton EMC Natural Gas

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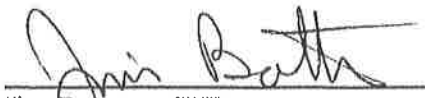
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DIRECT TESTIMONY OF PAUL HERRON, LORI SMITH, DAVID WAGNER

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Noah Turner, Regulatory Affairs Manager
Mansfield Power & Gas

BEFORE THE PUBLIC SERVICE COMMISSION

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BEFORE THE PUBLIC SERVICE COMMISSION

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MARKETER SIGNATURES

Patricia Chang

Patricia Chang, Sr. Government Affairs Manager

Constellation

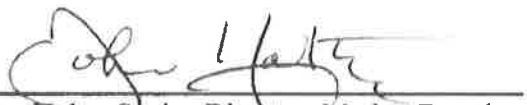
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DIRECT TESTIMONY OF PAUL HERRON, LORI SMITH, DAVID WAGNER

MARKETER SIGNATURES



John Holtz, Senior Director, Market Development & Regulatory Affairs
on behalf of Green Mountain Energy Company,
XOOM Energy Georgia LLC, and
Stream Energy Georgia LLC

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August 7, 2025

VIA ELECTRONIC DELIVERY

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

RE: **Gas South, LLC, Mansfield Power & Gas, LLC, SCANA Energy Marketing LLC, SouthStar Energy Services LLC d/b/a Georgia Natural Gas, Walton EMC Natural GAS, Inc. d/b/a True Natural Gas, Walton EMC Natural Gas**

Atlanta Gas Light Company's 2025-2028 Capacity Supply Plan
Pre-Filed Direct Testimony of Paul Herron, Lori Smith and David Wagner
Docket No. 56177

Dear Ms. Tanner:

We have enclosed for filing on behalf of Intervenor Marketers Gas South, LLC, Mansfield Power & Gas, LLC SCANA Energy Marketing LLC, SouthStar Energy Services LLC d/b/a Georgia Natural Gas, EMC Natural GAS, Inc. d/b/a True Natural Gas, Walton EMC Natural Gas ("Marketer Group") the following for the above-referenced Docket:

" Pre-Filed Direct Testimony of Paul Herron, Lori Smith and David Wagner"

Please return to us an extra copy of each showing the date of filing. If you have any questions concerning this filing, please feel free to contact us.

Sincerely,

Willaim Bradley Carver, Sr.

Attorney for Marketer Group

WBC/RFJ/CHS/JDK