Atlanta Gas Light

10 Peachtree Place NE
Atlanta, GA 30309
404 584 4000 tel

August 15, 2025

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

RE: Docket 4167-U: Annual Environmental Response Cost Recovery Expenses

Dear Ms. Tanner:

In accordance with the requirements of Section IV, paragraph (D) of the Settlement Agreement in the above –referenced docket, enclosed please find several schedules depicting the purpose of the Environmental Response Costs incurred by Atlanta Gas Light Company ("AGLC") during the period July 1, 2024 – June 30, 2025.

We are also enclosing a brief summary of the current and projected remediation activities for the manufactured gas plant sites and an update to AGLC's tariff, Sheet 9.3, reflecting the updated Environmental Response Cost Recovery Rider rate effective October 1, 2025.

If you have any questions regarding this information, please feel free to contact me at 404-584-4263 or mmorley@southernco.com.

Respectfully,

Mike Morley
Director, Regulatory Reporting & Strategy

Enclosures

cc: All Commissioners
Nancy Tyer, Natural Gas Section
Janey Chauvet, Natural Gas Section
Tony Wackerly, Natural Gas Section
Bryan Batson, AGL
Pedro Cherry, AGL
Greg Corbett, AGL

Manufactured Gas Plant Sites
Annual Update
Period Ending June 30, 2025

Atlanta Gas Light Company (AGLC) continues to move forward with the investigation and remediation of its former manufactured gas plant (MGP) sites pursuant to Georgia Environmental Protection Division (EPD) regulations and laws. During this year, AGLC incurred total expenses of $1.2 M for investigation, remediation, and associated activities. Expenses incurred for legal advice and services related to environmental regulations, pursuit of potentially responsible parties, and related activities were ~$103K. The cumulative amount for recoveries from third parties, insurance carriers, and potentially responsible parties since inception is in excess of $27.3 million. During the cost year, there were no third-party recoveries from insurance or other sources. A brief narrative of the significant activities during the year, including significant historical regulatory events, is presented below, and is followed by an overview of planned activities for the next year.

Manufactured Gas Plant Sites
Past Activities
Period July 1, 2024 – June 30, 2025

Georgia Sites

Athens

- Site construction in connection with redevelopment by the property owner Athens-Clarke County (ACC) is complete. Georgia Power Company (GPC) and AGLC worked with ACC and its contractors on soil or water handling and disposal as needed.

Augusta

- AGLC continued to evaluate optimal beneficial reuse of the parcels AGL owns taking into account all relevant considerations.
- In an email in early March, EPD requested the revised parcel summary table (Table 1) and associated figures by email as part of a Voluntary Remediation Program (VRP) Compliance Status Report (CSR) Addendum to document parcel designation changes for their approval. On April 8th, AGLC submitted the VRP CSR Addendum as a letter to document parcel designation changes per EPD's request.

Brunswick

- The Annual Site Visual Reconnaissance Inspection Report conducted in June 2024 was submitted on July 31st 2024. In an email on July 2, 2025, EPD provided their review and approval of this report in a letter dated June 30, 2025. The EPD stated that they found the document to be satisfactory.
- The annual visual site reconnaissance was conducted on June 4, 2025. The report is being prepared and will be submitted by August 31st.
- This site is shared with GPC and, per agreement, AGLC leads the ongoing monitoring efforts.

Griffin

- In an email dated August 8, 2024, EPD provided approval of the revised language proposed in the draft Universal Environmental Covenant (UEC).
- On August 22, 2024, EPD provided a letter that stated they determined the VRP CSR is complete, and they concur with AGLC's certification that soils are in compliance with the Type 2 risk reduction standards (RRS) listed for regulated substances associated with releases from the former MGP site. The letter further stated that EPD concurs that groundwater beneath the VRP property will comply with the purposes, provisions, and policies of the VRP Act through the use of a UEC

restricting groundwater use. In the letter, EPD requested that AGLC provide documentation of the required notices and executed UEC to EPD by October 15, 2024.

- AGLC prepared and distributed the required UEC notices to abutting property owners, compiled notifications of receipt of the UEC notices, obtained necessary internal signatures on the UEC, and submitted the AGLC-signed UEC for execution in early October 2024. The UEC was executed on February 19, 2025.
- The Site was delisted on April 1, 2025.
- The well abandonment work plan was finalized and submitted to EPD on June 11, 2025 and approved on June 13th. The well abandonments were completed June 17-18, 2025.

Macon

- With the submittal of the VRP CSR, groundwater monitoring and Semiannual VRP Progress Reports have been discontinued.
- In a continuation of monitoring well abandonment activities initiated with EPD's approval earlier in the year, AGLC intends to try and locate several monitoring wells that have been covered up by redevelopment activities in the northwest corner of the site, near the intersection of 6th and Mulberry Streets using GPS coordinates and a metal detector next quarter. If located, AGLC will re-mobilize in an attempt to abandon all remaining wells. A monitoring well abandonment report will be submitted once all wells have been abandoned unless EPD requests one sooner.
- Based on a review of historical soil and groundwater data, in conjunction with additional assessments conducted under the Brownfields Program, EPD notified AGLC that it will not likely require UECs for Tax Parcels R074-0202, R081-0124, R082-0002, R082-0003, and R082-0004 (collectively, the 7th Street Assemblage), since those parcels appear to meet residential standards. EPD has not provided this information in writing.

Macon 2

- No field activities or further reports are expected at this site.
- As background for non-field activities that may occur in future reporting periods, in 2005 AGLC and GPC entered into an Agreement Regarding Past Costs and Restrictive Covenants (the "2005 Agreement") with the Macon-Bibb County (MBC) and Macon Urban Development Authority (MUDA), current owners of the Macon 2 property. Among other things, the 2005 Agreement called for the utilities to clean up the property to nonresidential standards and to pay MBC compensation for limiting the property to nonresidential use. The 2005 Agreement also gave MBC rights to change the restrictions to include residential uses but only after returning to AGLC and GPC the compensation paid for the restrictions. In late September 2019, AGLC and GPC received a package of information from an attorney for MBC and MUDA indicating that they have been actively exploring residential site development on the property. Through these communications, AGLC and GPC learned that in May 2015 MBC and MUDA submitted an application to enter the site into the VRP. The remedial plan included conducting additional investigation to determine the extent of any further corrective action that might be needed to certify site soils to residential standards. EPD accepted the site into the VRP in 2015 and investigation and excavation activities were conducted from 2014 to 2018. A VRP CSR was submitted in November 2018, with an amendment in April 2019. In May 2019, MUDA executed a new UEC that conflicted with the restrictions required by the 2005 Agreement by allowing for some residential use and listing only MBC and MUDA as "Interested Parties" while excluding AGLC and GPC. The UEC also failed to bring the existing restrictions to the attention of EPD. After notifying MBC and MUDA of these concerns, AGLC and GPC made an extensive review of the 2005 Agreement and all relevant correspondence from 2014 to date in order to develop a possible approach that would honor the 2005 Agreement while allowing MBC and MUDA to achieve their redevelopment goals. In January 2022, AGLC and GPC provided a draft term sheet to MUDA for an agreement that would replace the 2005 Agreement. On February 10, 2022, MUDA's board approved the parameters of the proposed term sheet. Therefore, all parties appear to be ready to proceed towards negotiating a

definitive agreement; however, MBC and MUDA have delayed further efforts pending commitments from private development partners

Rome

- *(Background)* The Rome MGP site was delisted from Georgia's Hazardous Site Inventory (HSI) and reclassified as a Class III site in an EPD letter dated August 10, 2015.
- The Annual Site Visual Reconnaissance Inspection was conducted in August 2024 and the report was submitted on September 24, 2024.
- In an email on July 2nd, EPD provided their June 30, 2025 letter that included review comments of the 2024 Annual CAMP Inspection Report, dated September 24, 2024. They stated that they found the document to be satisfactory; however, they noted the following:
  1. The Type 5 marker on the sidewalk along West 1st Street was covered by a dumpster. Furthermore, parts of the marker appear to be illegible. If the marker is not visible or is illegible during the 2025 inspection, installation of a new marker may be required.
  2. The caption on Photo 14 describes a grassy embankment between Parcel 4 and the riverbank. However, Parcel 4 does not adjoin the river.
  3. In future inspection reports, please specify a camera compass direction in each photograph's caption.

Savannah

- *(Background)*AGLC completed the remediation of soil impacts with site restoration occurring in May 2005. Closure Reports were approved in June 2006 with a certain portion of the site with impacts remaining in places designated as a Type 5 (engineering controls) area, remaining on Georgia's HSI in perpetuity.
- Quarterly system effluent sampling and flow meter readings continued in July 2024 through June 2025.
- The results of the quarterly effluent sample collected in June 2024 and flow meter readings were submitted in a Quarterly Discharge Monitoring Report (DMR) on July 15, 2024.
- Quarterly effluent sampling covering the period July through September of 2024 was conducted in September 2024. The results of the quarterly effluent sample collected in September 2024 and flow meter readings were submitted in a Quarterly DMR on October 15, 2024.
- Quarterly effluent sampling covering the period October through December of 2024 was conducted in December 2024. The semiannual flow meter calibration was also conducted in December.
- The results of the quarterly effluent sample collected in December 2024 and flow meter readings were submitted in a Quarterly DMR on January 15, 2025.
- AGLC received an email on January 21, 2025 from the City of Savannah Water Reclamation Department, which stated that they will require that the effluent samples be analyzed for total dissolved solids (TDS) starting in March 2025. Therefore, this analysis was added to the March 2025 and future quarterly effluent sampling events.
- Quarterly effluent sampling covering the period January through March of 2025 was conducted in March 2025. The results of the quarterly effluent sample collected in March 2025 and flow meter readings were submitted in a Quarterly DMR on April 15, 2025.
- Quarterly effluent sampling covering the period April through June of 2025 was conducted in June 2025. The quarterly flow meter calibration was also conducted in June 2025.
- The Annual Site Visual Inspection per the 2016 CAMP was conducted on June 4, 2025.
- AGLC received an email on April 21, 2025 from the City of Savannah Water Reclamation Department, which stated that they will require monthly sampling of the effluent samples for cyanide starting in May 2025. Therefore, monthly sampling for cyanide was added in May 2025 and future monthly and quarterly effluent sampling events. The April permit also contained a compliance schedule, which required updates on AGLC's progress in achieving compliance but specified that exceedances would not be counted as violations.

- A Compliance Schedule Form was required to be filled out for the compliance schedule. Per the City of Savannah's request, AGLC and the City held a teleconference to review the completed form and AGLC's proposed Compliance Schedule on May 19, 2025. The City stated they would review our plan and provide comments.
- After review of the proposed Compliance Schedule and our discussion on the May 19th call, the permit limit for cyanide was increased to 0.20 milligrams per liter and 0.010 pounds per day per the email from EPD on June 18, 2025 and the revised permit. In addition, the cover letter for the June permit indicated that the compliance schedule requirement was lifted.

Valdosta

- As the site has been delisted, the UEC has been recorded, and long-term monitoring is not required, no field activities or further reports are expected at this site.

Waycross

- AGLC met with EPD on August 21, 2024 to discuss their comments and the format/requirements of the final site CSR. EPD stated that they would prefer at least one additional sampling event in MW-17A to confirm that concentrations of site COI are below the Type 1 RRS (residential). AGLC agreed and collected a groundwater sample from MW-17A in September, which resulted in concentrations below the relevant standards. The results will be included in the CSR.
- AGLC initiated preparation of the CSR in lieu of performing annual groundwater monitoring in March 2025.
- In preparation for drafting the UEC, AGLC determined that an updated property survey/description was needed as an exhibit to the draft UEC and procured a firm to obtain the survey.

Florida Sites

Orlando

OU1:

- Continued operation of the remediation system and remediation system related sampling and operation and maintenance (O&M) in accordance with the Short-Term Groundwater Monitoring Plan and approved proposed modifications to the groundwater performance monitoring program included in Table 25 of the *October 2023 Semi-Annual Report (Year 3 Month 7-12 Reporting Period)* submitted to the United States Environmental Protection Agency (USEPA) and Florida Department of Environmental Protection (FDEP) on October 24, 2023. In May, the Potentially Responsible Parties (Group) and Geosyntec implemented the proposed modifications to the groundwater performance monitoring program in the *April 2024 Semi-Annual Report (Year 4 Month 1-6 Reporting Period)* to reduce frequency of SVE system soil vapor sampling from monthly to quarterly based upon the low mass recovery.
- Quarterly sampling was performed.
- The air sparge system (primary site groundwater remediation technology for impacts outside the barrier wall) continued operations on a cycled basis. The SVE system continued operations.
- The Group and Geosyntec submitted the OU1 *Y4, Month 7-12 Semi-Annual Performance Monitoring Report* on October 21, 2024. The Report included a recommendation for a limited rebound study to support a transition to MNA in the Northern and Western Areas.
- In an email dated February 10, 2025, USEPA approved the recommendation for a limited rebound study to support a transition to MNA in the Northern and Western Areas contained in the OU1 2024 *Y4, Month 7-12 Semi-Annual Performance Monitoring Report*.
- Pursuant to the approved Limited Rebound Study Plan (LRSP), Geosyntec conducted supplemental baseline groundwater performance monitoring at injection wells EW002 through EW004 on 17 March 2025 (the balance of the LRSP baseline performance monitoring was conducted in conjunction with the January 2025 Year 5 Quarter 2 monitoring event).

- The Group and Geosyntec submitted the *OU1 Semi-Annual Report for Year 5 Months 1 through 6* to USEPA and FDEP on May 7, 2025.

OU2:

- The Group received technical and legal review comments on the draft OU2 Feasibility Study (FS) from USEPA in October 2024.
- The Group began preparation of the Request for Qualifications (RFQ) package for the OU2 design bid.
- A teleconference between the Group and USEPA representatives was held on November 12, 2024 to discuss a path forward to address agency comments on the draft FS. During the teleconference it was noted by USEPA that additional review comments from USEPA headquarters could potentially take up to a year.
- USEPA provided the Group with a set of Applicable, Relevant and Appropriate Requirements (ARARs) tables in December, which contain proposed revisions. Additionally, the Group received a set of comments from USEPA pertaining to risk assessment topics.
- The Group and Geosyntec submitted responses to USEPA's technical and legal review comments on the draft OU2 FS on January 22, 2025.
- USEPA provided additional FS comments on February 25, 2025.
- The Group and Geosyntec prepared responses and additional revisions to the agency comments on the FS Applicable, Relevant and Appropriate Requirements tables, which were formally submitted to USEPA on February 28, 2025.
- The Group scheduled an in-person meeting in mid-April 2025 for the purpose of reviewing the current responses, preparing appropriate responses to the additional anticipated agency comments on the FS, and discussing timings for the Proposed Plan and Record of Decision (ROD).
- The Group and Geosyntec received additional comments regarding the FS Applicable, Relevant and Appropriate Requirements tables on April 14, 2025. The Group, USEPA, and FDEP held an in-person meeting on April 16th for the purpose of discussing and resolving agency comments on the FS report and to coordinate the timeline for finalizing the FS report. Summary meeting notes were generated by the Group and subsequently transmitted to USEPA (transmittal dated May 2, 2025).
- The Group and Geosyntec submitted a red-lined/strikeout version of the revised OU2 FS to USEPA on May 30, 2025.

St. Augustine

- AGLC continued to work with the owner and City to provide assistance with the soil management oversight during site development, as needed.
- The development of the marina site was initiated in early March 2024 and is mostly complete with the hotel scheduled to be opened in Winter 2025.
- AGLC came to agreement with the owner on its total responsibility for soil transportation and disposal during the initial phase of site development.
- The annual groundwater monitoring report with the results of the December 2024 monitoring event was submitted. This report included the 5-year review.

Sanford

- The annual groundwater monitoring report was submitted in September 2024.
- The Group submitted a response on the Draft Five-Year Review to USEPA. EPA received the response and Skeo updated the report and figures. The Five-Year Review was finalized in December 2024.

- The USEPA PM reviewed the 2024 Annual Groundwater Monitoring Report (AGWMR) and provided comments in a letter dated February 13, 2025. They indicated receptiveness to the proposed approach of evaluating the data from the upcoming May sitewide sampling event to make a recommendation for a second sampling event in August of MNA Area 4. FDEP had no comments. USEPA stated if the groundwater concentrations are increasing in the upcoming 2025 sampling event(s), the Group will need to provide some options for active remediation in MNA Area 4 in the 2025 AGWMR.
- Comments from USEPA were discussed during the call with EPA on the 2024 Annual Groundwater monitoring Report and/or the Third Five-Year Review Report identified three areas of concern regarding groundwater quality. These areas include: MNA Area 4 and MNA Area 3 (specifically monitoring wells MW-204 and MW-101D). Based on elevated and increasing concentrations in MW-114, an additional round of groundwater sampling was recommended , at a minimum, collecting an additional round of groundwater samples from monitoring wells located in the MNA Area 4, specifically TW-01, TW-02, MW-106R, and TW-114 in August 2025. Comments from USEPA will be addressed in the 2025 AGWMR.
- The May 2025 annual groundwater monitoring event and site inspection was completed on May 22nd. A draft summary will be sent to the Group in 4 to 6 weeks for review prior to sending it to USEPA and FDEP for review and discussion.

Manufactured Gas Plant Sites
Planned Activities
Period July 1, 2025 - June 30, 2026

Georgia Sites

Athens

- Site construction in connection with redevelopment by the property owner Athens-Clarke County was completed in December 2024. No activities are planned for this quarter.

Augusta

- AGLC will continue to work toward site closure.
- AGLC will continue to work with JLL and local officials to identify parties interested in developing the parcels.
- Once the CSR is approved, AGLC will submit the draft Type 5 marker language and draft uniform environmental covenants (UECs) for all affected parcels to EPD. Once the UEC language is approved, AGLC will submit drafts to the appropriate parties of the affected parcels.
- The CSR and CSR Addendum for the site is expected to be approved in Q3 2025.

Brunswick

- The report of the annual visual site reconnaissance will be finalized and submitted by August 30th.
- The next annual site visual reconnaissance survey will be conducted in accordance with the CAMP in June 2026.

Griffin

- With the submittal of the VRP CSR, groundwater monitoring and Semiannual VRP Progress Reports have been discontinued.
- AGLC will prepare the Well Abandonment Report to document the well abandonment activities at the site.

Macon

- With the submittal of the VRP CSR, groundwater monitoring and Semiannual VRP Progress Reports have been discontinued.
- In a continuation of monitoring well abandonment activities initiated with EPD's approval earlier in the year, AGLC intends to try and locate several monitoring wells that have been covered up by redevelopment activities in the northwest corner of the site, near the intersection of 6th and Mulberry Streets using GPS coordinates and a metal detector next quarter. If located, AGLC will re-mobilize in an attempt to abandon all remaining wells. A monitoring well abandonment report will be submitted once all wells have been abandoned unless EPD requests one sooner.
  AGLC will respond to EPD's comments on the remaining UECs, if any received, and will continue to work toward site closure and delisting.

Macon 2

- No field activities or further reports are expected at this site.
- No activities are planned to be conducted this quarter.
- In terms of possible non-field activities reported in prior updates, in 2005 AGLC and GPC entered into an Agreement Regarding Past Costs and Restrictive Covenants (the "2005 Agreement") with Macon-Bibb County (MBC) and Macon Urban Development Authority (MUDA), current owners of the Macon 2 property. MBC and MUDA have expressed interest in redevelopment activities that might require amendments to the 2005 Agreement. The parties exchanged a term sheet in 2022 and appeared to be ready to proceed towards negotiating a definitive agreement. However, MBC and MUDA have delayed further efforts pending commitments from private development

partners. Should MBC and MUDA wish to restart these discussions, AGLC and GPC would expect to cooperate to the extent any proposed redevelopment does not pose unacceptable risks to human health or the environment and is otherwise reasonable from the perspectives of AGLC, GPC, and ratepayers.

Rome

- In August 2025, an annual visual site reconnaissance survey will be conducted in accordance with the CAMP and the report will be submitted by September 30, 2025.

Savannah

- The groundwater interceptor system will continue to operate, including the monthly and quarterly effluent sampling and DMR submittals, until further notice from EPD.
- Monthly and quarterly system effluent sampling and flow meter readings will continue in this period.
- The results of the quarterly effluent sample covering the period April to June 2025 (June sampling), monthly sampling for cyanide in May and June 2025, and flow meter readings collected in June 2025 will be submitted in a Quarterly DMR by July 15, 2025. Semiannual flow meter calibration was also conducted in June 2025. The proof of calibration will be submitted with the Quarterly DMR on July 15, 2025.
- The Annual Site Visual Inspection per the 2016 CAMP was conducted in June and the report will be submitted by July 15th. This report will also include copies of the 3rd Quarter (Q3) and Q4 2024 DMRs and Q1 and Q2 2025 DMRs.
- The results of quarterly effluent samples covering the periods July to September 2025, October to December 2025, January to March 2026, and April to June 2026 and associated flow meter readings will be submitted in Quarterly DMRs by October 15, 2025, January 15, April 15, and July 15, 2026, respectively.
- Semiannual flow meter calibration and system repairs (as needed) will be conducted in the second half of 2025 and the first half of 2026; the calibrations are to be performed no later than the end of the months of June and December. The proof of calibration will be submitted no later than July 15th and January 15th, respectively.
- After an evaluation of site current and historical groundwater elevation data, AGLC concluded that the system does not need to be restored to full operation status (i.e., pumping wells and system repaired and operational) to be effective. In addition, since the effluent data has been below detection limits for over 10 years, AGLC is contemplating AGLC is contemplating closure options, which may include entering the site into the VRP.
- Since the groundwater pumping wells are not required to maintain groundwater levels below the groundwater interceptor wall and the system cannot be returned to full operational status (without great expense or effort), AGLC may decommission the pumping wells and remove all electrical wiring feeding into the vault and surface materials (and potentially the entire vault) in 2025.
- AGLC will continue to coordinate with GPC site workers that need to enter the areas with a groundwater restriction during development of three hotels on the former Southern Electric Power Company property.
- AGLC will coordinate with the owner of the Type 5 property on re-installation of the missing Type 5 markers with permanent markers.
- AGLC will continue to work with the City on the Compliance Schedule and permit limits.

Valdosta

- No activities are planned.

Waycross

- MNA has been discontinued in lieu of AGLC submitting a CSR that will include a request for closure and delisting of the site

- The draft CSR has been prepared and will be reviewed by legal and management once the internal review is completed. The final CSR is anticipated to be submitted in August 2025.
- AGLC will prepare a draft UEC now that the updated property survey/description is obtained from the contracted party.

Florida Sites

Orlando

- **OU1:**
- Groundwater treatment systems in OU1 will be operated and monitored and operating parameters will be adjusted as needed.
- **OU2:**
- The preparation of the Request for Qualifications (RFQ) package for the OU2 design bid is currently on hold until comments received to date are resolved and additional comments from USEPA headquarters are received.
- The Group and Geosyntec will respond to additional comments provided by USEPA or FDEP on the FS Report, if received.

St. Augustine

- Annual groundwater sampling and reporting will continue.
- AGLC will continue to collaborate with the new property owner, developer, and the City to the extent continued development activities have implications for the remedy.
- The Group will work with USEPA and FDEP towards a "no further action" agreement for groundwater and closure of at the site. AGLC and the City will be responsible for continuing obligations associated with maintenance of the institutional controls. .

Sanford

- .The May 2025 Groundwater Sample Summary for the site is scheduled to be sent to the USEPA and FDEP by July 31st.
- The Group is planning to resample MNA Area 4 monitoring wells in August and potentially gather additional information to facilitate an evaluation of remedial options for the MNA Area 4.
- The Group will conduct the annual groundwater monitoring event and site inspection in May 2025.

Atlanta Gas Light Company
Calculation of Net Environmental Response Costs
To Be Recovered October 1, 2025 Through September 30, 2026

	Cost Year 30 7/20-6/21	Cost Year 31 7/21-6/22	Cost Year 32 7/22-6/23	Cost Year 33 7/23-6/24	Cost Year 34 7/24-6/25	Total
Total Costs	$1,379,006.53	$1,131,021.25	$1,187,466.94	$1,746,477.49	$1,190,595.99	
Amortization Period	5 Years	5 Years	5 Years	5 Years	5 Years	
Recovery Year	5	4	3	2	1	
Amount to be recovered 10/1/25 through 9/30/26 Before Deferred Tax Benefit	275,801.31	226,204.25	237,493.39	349,295.50	238,119.20	1,326,913.65
Deferred Tax Benefit (See Schedule 2)	(5,066.97)	(8,311.56)	(13,089.54)	(25,668.75)	(21,873.39)	(74,010.21)
Net Environmental Response Costs Amortization October 1, 2025 through September 30, 2026	270,734.34	217,892.69	224,403.85	323,626.75	216,245.81	1,252,903.44

Less:	Third Party Recoveries (See Schedule 5)	0.00
	Carrying Costs Accrued on Ratepayer Portion of Third Party Recoveries (See Schedule 5)	0.00
	Environmental Response Cost Balancing Adjustment (See Schedule 3)	(15,503.66)
	Carrying Costs Accrued on Environmental Response Cost Balancing Adjustment Twelve Months Ended 9/30/25 (See Schedule 3)	(1,205.03)
Amount Subject to Recovery from Ratepayers October 1, 2025 through September 30, 2026		1,269,612.13
Total Estimated Dedicated Design Day Capacity (DDDC) in Dts		2,839,603
ERC Factor per Dt of DDDC Each Year		0.45
ERC Factor per Dt of DDDC Each Month		0.0375

Atlanta Gas Light Company
Costs Incurred from July 1, 2024 through June 30, 2025

Schedule 1

Account Number	Description		Amount
18230928	Program Management Clean-Up Expense	$	594,385.01
18230929	Contractor Expense	$	196,902.45
18230930	Consultant Expense	$	295,819.50
18230931	Legal Litigation Expense	$	103,489.03
18230932	Legal Expense	$	-
18230933	Property Acquisition Settlement Expense	$	-
	Total Environmental Response Costs	$	1,190,595.99

Schedule 2

Atlanta Gas Light Company
Calculation of Deferred Tax Benefit
To Be Returned to Ratepayers

	Cost Year 30 7/20-6/21	Cost Year 31 7/21-6/22	Cost Year 32 7/22-6/23	Cost Year 33 7/23-6/24	Cost Year 34 7/24-6/25
Total Costs	1,379,006.53	1,131,021.25	1,187,466.94	1,746,477.49	1,190,595.99
X [(5-0)/ 5]					100%
X [(5-1)/ 5]				80%	
X [(5-2)/ 5]			60%		
X [(5-3)/ 5]		40%			
X [(5-4)/ 5]	20%				
	275,801.31	452,408.50	712,480.16	1,397,181.99	1,190,595.99
X Net Capital Cost Rate (Docket No. 42315-U Weighted After-Tax Cost of Capital)	7.38%	7.38%	7.38%	7.38%	7.38%
	20,349.26	33,379.75	52,568.45	103,087.35	87,844.95
X Effective Federal and State Income Tax Rate (See Below)	24.90%	24.90%	24.90%	24.90%	24.90%
Deferred Tax Benefit for Cost Year 30, Recovery Year 5	5,066.97				
Deferred Tax Benefit for Cost Year 31, Recovery Year 4		8,311.56			
Deferred Tax Benefit for Cost Year 32, Recovery Year 3			13,089.54		
Deferred Tax Benefit for Cost Year 33, Recovery Year 2				25,668.75	
Deferred Tax Benefit for Cost Year 34, Recovery Year 1					21,873.39
Federal Income Tax Rate [.21% X(1-.049339)]	19.97%	19.97%	19.97%	19.97%	19.97%
State Income Tax Rate	4.93%	4.93%	4.93%	4.93%	4.93%
Total Effective Federal & State Income Tax Rate	24.90%	24.90%	24.90%	24.90%	24.90%

Schedule 2

Atlanta Gas Light Company
Calculation of Deferred Tax Benefit
To Be Returned to Ratepayers

	Cost Year 29 7/19-6/20	Cost Year 30 7/20-6/21	Cost Year 31 7/21-6/22	Cost Year 32 7/22-6/23	Cost Year 33 7/23-6/24	
Total Costs	7,349,680.32	1,379,006.53	1,131,021.25	1,187,466.94	1,746,477.49	
X [(5-0)/ 5]					100%	
X [(5-1)/ 5]				80%		
X [(5-2)/ 5]			60%			
X [(5-3)/ 5]		40%				
X [(5-4)/ 5]	20%					
	1,469,936.06	551,602.61	678,612.75	949,973.55	1,746,477.49	
Amounts Oct. - Dec 2024						
X Net Capital Cost Rate	7.201%	7.201%	7.201%	7.201%	7.201%	
(Docket No. 42315-U Weighted After-Tax Cost of Capital)						
	105,847.20	39,719.82	48,865.57	68,405.72	125,760.40	
X Effective Federal and State Income Tax Rate (See Below)	25.04%	25.04%	25.04%	25.04%	25.04%	
Deferred Tax Benefit for Cost Year 29, Recovery Year 5	6,626.03					
Deferred Tax Benefit for Cost Year 30, Recovery Year 4		2,486.46				
Deferred Tax Benefit for Cost Year 31, Recovery Year 3			3,058.98			
Deferred Tax Benefit for Cost Year 32, Recovery Year 2				4,282.20		
Deferred Tax Benefit for Cost Year 33, Recovery Year 1					7,872.60	
Amount Oct. 24-Dec.24					24,326.27	
					8,109	Monthly Amount for Oct. - Dec .24
Federal Income Tax Rate [.21% X(1-.05114)]	19.93%	19.93%	19.93%	19.93%	19.93%	
State Income Tax Rate	5.11%	5.11%	5.11%	5.11%	5.11%	
Total Effective Federal & State Income Tax Rate	25.04%	25.04%	25.04%	25.04%	25.04%	
Amounts January 2025 to Present						
X Net Capital Cost Rate	7.38%	7.38%	7.38%	7.38%	7.38%	
(Docket No. 42315 Weighted After-Tax Cost of Capital)						
	108,455.31	40,698.53	50,069.63	70,091.26	128,859.18	
X Effective Federal and State Income Tax Rate (See Below)	24.90%	24.90%	24.90%	24.90%	24.90%	
Deferred Tax Benefit for Cost Year 29, Recovery Year 5	20,254.03					
Deferred Tax Benefit for Cost Year 30, Recovery Year 4		7,600.45				
Deferred Tax Benefit for Cost Year 31, Recovery Year 3			9,350.50			
Deferred Tax Benefit for Cost Year 32, Recovery Year 2				13,089.54		
Deferred Tax Benefit for Cost Year 33, Recovery Year 1					24,064.45	
Amount Jan. 25 - Sep. 25					74,358.97	
					8,262	Monthly Amount for Jan.-Sept 25
Federal Income Tax Rate [.21% X(1-.049339)]	19.97%	19.97%	19.97%	19.97%	19.97%	
State Income Tax Rate	4.93%	4.93%	4.93%	4.93%	4.93%	
Total Effective Federal & State Income Tax Rate	24.90%	24.90%	24.90%	24.90%	24.90%	

Adjustment Summary by Cost Year

Revised Tax Benefit Calculation	Cost Year 29 7/19-6/20	Cost Year 30 7/20-6/21	Cost Year 31 7/21-6/22	Cost Year 32 7/22-6/23	Cost Year 33 7/23-6/24	Total
Prior Year Filing - Before Cost of Capital Change	26,504.14	9,945.84	12,235.94	17,128.79	31,490.40	97,305.11
Prior Year Filing - After Cost of Capital Change	26,880.06	10,086.91	12,409.48	17,371.74	31,937.05	98,685.24
Adjustment to Prior Year Tax Benefit Calculation	(375.92)	(141.07)	(173.54)	(242.95)	(446.65)	(1,380.13)
Monthly from Jan. 2025 through Sept. 2025	(41.77)	(15.67)	(19.28)	(26.99)	(49.63)	(153.35)

Schedule 3

Atlanta Gas Light Company
Calculation of Carrying Costs
on Balancing Adjustment
Environmental Response Cost
October 2024 - September 2025

Month	Monthly Amortization	Monthly Revenue	Monthly Balancing Adjustment (162-065 - 0000)	Cumulative Balancing Adjustment	Average Monthly Balance	Carrying Costs *	Cumulative Carrying Costs
Balance as reported from previous year	303,111,677.12	303,689,918.57		(60,880.74)			(3,191.47)
Adjustment	0.00	(13,508.92)		13,508.92			151.70
Balance adjusted to actual **	303,111,677.12	303,676,409.65		(47,371.82)			(3,039.77)
Amount Applied***			60,880.74	13,508.92		3,191.47	151.70
October	199,779.43	193,890.59	5,888.84	19,397.76	(13,987.03)	(111.97)	39.73
November	199,779.43	197,537.51	2,241.92	21,639.68	20,518.72	164.26	203.99
December	199,779.43	200,646.84	(867.41)	20,772.27	21,205.97	169.76	373.75
January 2025	199,626.08	202,317.37	(2,691.29)	18,080.98	19,426.63	159.04	532.79
February	199,626.08	203,628.36	(4,002.28)	14,078.70	16,079.84	131.64	664.43
March	199,626.08	203,811.43	(4,185.35)	9,893.36	11,986.03	98.13	762.56
April	199,626.08	203,609.82	(3,983.74)	5,909.62	7,901.49	64.69	827.25
May	199,626.08	200,663.21	(1,037.13)	4,872.49	5,391.05	44.14	871.39
June	199,626.08	196,968.29	2,657.79	7,530.28	6,201.39	50.77	922.16
July ****	199,626.08	196,968.29	2,657.79	10,188.08	8,859.18	72.53	994.69
August ****	199,626.08	196,968.29	2,657.79	12,845.87	11,516.97	94.29	1,088.98
September ****	199,626.08	196,968.29	2,657.79	15,503.66	14,174.76	116.05	1,205.03
TOTAL	$305,507,650.15	$306,070,387.94		$15,503.66			$1,205.03

* After tax cost of capital - 7.201% and revenue expansion factor - .7496 from October 2024 to December 2024.
After tax cost of capital - 7.378% and revenue expansion factor - .7510 from January 2025 to present

** Schedule 4 shows adjustment to prior year's carrying costs.

*** Amount applied in previous year's filing.

**** Estimated Revenues

Schedule 4

Atlanta Gas Light Company
Calculation of Carrying Costs
on Balancing Adjustment
Environmental Response Cost
October 2023 - September 2024

Month	Monthly Amortization	Monthly Revenue	Monthly Balancing Adjustment (162-065 - 0000)	Cumulative Balancing Adjustment	Average Monthly Balance	Carrying Costs *	Cumulative Carrying Costs
Balance as reported from previous year	297,005,871.74	297,525,701.58		(19,410.03)			476.53
Adjustment	0.00	(8,453.55)		8,453.55			94.84
Balance adjusted to actual ***	297,005,871.74	297,517,248.03		(10,956.48)			571.37
Amount Applied**			16,940.90	5,984.42		(785.85)	(214.48)
October	509,045.74	499,118.77	9,926.97	15,911.39	2,477.46	19.30	(195.18)
November	509,045.74	508,972.97	72.77	15,984.16	15,947.77	124.21	(70.97)
December	509,045.74	518,020.55	(8,974.81)	7,009.35	11,496.75	89.54	18.57
January 2024	508,740.91	523,239.83	(14,498.92)	(7,489.57)	(240.11)	(1.92)	16.65
February	508,740.91	524,600.85	(15,859.94)	(23,349.52)	(15,419.55)	(123.44)	(106.79)
March	508,740.91	524,793.90	(16,052.99)	(39,402.51)	(31,376.01)	(251.18)	(357.97)
April	508,740.91	523,849.45	(15,108.54)	(54,511.05)	(46,956.78)	(375.91)	(733.88)
May	508,740.91	517,420.54	(8,679.63)	(63,190.69)	(58,850.87)	(471.12)	(1,205.00)
June	508,740.91	508,163.42	577.49	(62,613.20)	(62,901.94)	(503.55)	(1,708.55)
July	508,740.91	504,464.47	4,276.44	(58,336.76)	(60,474.98)	(484.13)	(2,192.68)
August	508,740.91	503,365.91	5,375.00	(52,961.77)	(55,649.27)	(445.49)	(2,638.17)
September	508,740.91	503,150.96	5,589.95	(47,371.82)	(50,166.79)	(401.60)	(3,039.77)
TOTAL	$303,111,677.12	$303,676,409.65		($47,371.82)			($3,039.77)

* After tax cost of capital - 6.9815% and revenue expansion factor - .747 from October 2023 to December 2023.
After tax cost of capital - 7.201% and revenue expansion factor - .7496 from January 2024 to September 2024.

** Amount applied in previous year's filing.

Schedule 5

Atlanta Gas Light Company
Calculation of Carrying Cost on Third Party Recoveries - Ratepayer Portion
Received July 1, 2024 through June 30, 2025

Month	Date Received	Amount	Balance	Days Outstanding	Factor * (.0738/365 Days)/.7510	Carrying Cost
Balance from previous year.			0.00			0.00
Amount applied in prior year's filing			0.00			0.00
Balance						
July			0.00	31	0.000263	0.00
August			0.00	31	0.000263	0.00
September			0.00	30	0.000263	0.00
October			0.00	31	0.000263	0.00
November			0.00	30	0.000263	0.00
December			0.00	31	0.000263	0.00
January			0.00	31	0.000269	0.00
February			0.00	28	0.000269	0.00
March			0.00	31	0.000269	0.00
April			0.00	30	0.000269	0.00
May			0.00	31	0.000269	0.00
June			0.00	30	0.000269	0.00
July			0.00	31	0.000269	0.00
August			0.00	31	0.000269	0.00
September			0.00	30	0.000269	0.00
Balance at 10/1/25			0.00			0.00

* After tax cost of capital - 7.38% and revenue expansion factor - .7510.

9. Environmental Response Cost (ERC) Recovery Rider (continued)

9.5 Current Rate

Effective October 1, 202~~4~~5, a rate of $0.~~84~~45 per Dt of DDDC per year shall be assessed based upon the terms of this Rider per year.

9. Environmental Response Cost (ERC) Recovery Rider (continued)

9.5 Current Rate

Effective October 1, 2025, a rate of $0.45 per Dt of DDDC per year shall be assessed based upon the terms of this Rider per year.