BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION

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

STIPULATION

The Georgia Public Service Commission Natural Gas Staff (a "Party" to this Stipulation and hereinafter referred to within this Stipulation as "Staff"), and Liberty Utilities (Peach State Natural Gas) Corp. (a "Party" to this Stipulation and hereinafter referred to within this Stipulation as either "Liberty" or the "Company") agree to the following Stipulation as a resolution to the Company's 2025 – 2026 Gas Supply Plan. The parties request that the Commission approve the Company's 2025 – 2026 Gas Supply Plan subject to the following conditions:

1. **Adjustments to PGA Factor**

   Liberty shall modify its proposed PGA Factor to be effective October 1, 2025, to include an imbalance adjustment for the projected over/under recovery for the 2024 – 2025 recovery year as required by O.C.G.A § 46-2-26.5(e).

   In light of relatively large changes to the cost of natural gas that sometimes occur between (a) the usual time to file PGA Factors in the middle of each month, and (b) the effective date of those new PGA rates at the beginning of the following month, Staff and Liberty request that the Commission exercise its authority under O.C.G.A. § 46-2-26.5(i) to continue to authorize and direct Liberty to file PGA Factors near to the date they will become effective, if needed to more accurately set a PGA rate. A similar provision was included in the last three Gas Supply Plans and was approved. With the Commission's approval of this Stipulation, Liberty will be authorized to continue to file changes in PGA rates that will become effective in as few as two days following the PGA rate filing. This directive for Docket 56178 shall be effective for the period beginning with the issuance of an Order in this docket through the end of the 2025 – 2026 Gas Supply Plan Year (September 30, 2026).

2. **Monthly and Quarterly Reports**

   Liberty shall continue to make monthly and quarterly filings of gas costs and recovery positions for the 2025 – 2026 Plan Year, pursuant to O.C.G.A. § 46-2-26.5 and Commission Utility Rule 515-7-2-.08. This information will continue to be filed as an Excel spreadsheet with live and unlocked formulas.

3. **2026 - 2027 Plan Year Design Day Forecast and 2026 – 2027 Gas Supply Plan**

   Liberty shall file its Design Day Forecast with the Commission for the 2026 – 2027 Plan Year no later than 4:00 p.m. on June 1, 2026, along with documentation regarding its demand forecasting methodology (in an Excel spreadsheet with enabled formulas intact), as further described below. Liberty shall file its 2026 – 2027 Gas Supply Plan no later than 4:00 p.m. on July 1, 2026.

4. Design Day Forecast Methodology.

a) Both Parties agree that it is important to forecast accurately the design day system requirements. For the 2025 – 2026 Plan Year, the Liberty Design Day Forecast is approved as filed on July 1, 2025, and as revised by its July 17, 2025 filing, based on HDDs, which is the methodology approved by the Commission in the last two Gas Supply Plan filings in Georgia (Docket Nos. 45083 and 55650).

For the 2026 – 2027 Gas Supply Plan, Liberty will once again file two versions of the forecasts replicating that same methodology using (a) HDDs, and (b) EDDs. The Company and Staff have agreed that Liberty will file using HDDs and EDDs so that Staff and Liberty can study the merits and accuracy of each approach over three plans. Unless the Parties agree or the Commission orders otherwise, the array of assets based within the 2026 – 2027 Gas Supply Plan shall be sufficient to meet the forecast based on the HDDs methodology.

b) In the event that either Party to this Stipulation identifies other changes to the existing methodology that it determines will improve the forecasts, that Party may inform the other Party so that if the changes were to be agreed to, either Party may propose such changes in future Gas Supply Plan filings, together with information and materials to support such changes, if any. If either Party seeks to propose a demand forecast methodology for Liberty's 2026 – 2027 Gas Supply Plan that is different from Liberty's demand forecast methodologies contained in the approved 2025 – 2026 Gas Supply Plan, the Company and Staff shall meet sufficiently prior to the June 1, 2026, demand forecast filing to discuss the specific proposed changes. Nonetheless, in addition to any other forecast that may be filed by the Company for the 2026 – 2027 Plan Year, Liberty shall include two versions of a Design Day Forecast (as provided in subsection (a) above) based on the methodology filed by the Company and approved by the Commission in this Gas Supply Plan filing, specifically including, but not limited to:

i. A Heating Degree Day requirement (as well as an Effective Degree Day requirement) based on the coldest day in Columbus and the coldest day in Gainesville since 1984;

ii. The regression methodology used by Liberty for this docket;

iii. The Quandt-Andrews Break Point Test;

iv. A report of the test results for the 2026 – 2027 Plan Year; and

v. The Design Day Requirement as calculated above shall further be adjusted not to exceed a five percent (5%) reserve margin, unless otherwise approved by the Commission.

This requirement to file (in addition to any other forecasts that Liberty may file for the 2026 – 2027 Plan Year) a forecast based on the methodology filed by Liberty for this docket and described within this paragraph is not intended to and shall not prejudge the

appropriateness of a particular forecast methodology for the 2026 – 2027 Plan Year, but rather shall provide a basis for comparison of this current methodology to modifications, if any, proposed by the Company in the 2026 – 2027 Gas Supply Plan filing.

5. Peaking Services for Gainesville and Columbus Service Areas

For the 2024– 2025 Plan Year, the optimal level of citygate bundled peaking services for the Gainesville areas was determined to be 4,250 Dth per day, and the optimal level of citygate bundled peaking services for the Columbus areas was determined to be 6,200 Dth per day. These levels for the 2024 – 2025 Plan Year provided for an overall array of available assets that included approximately a 5% reserve margin, consistent with prior Commission precedent. As authorized, the Company entered into citygate peaking service agreements for not less than five days during the winter to secure these optimal levels.

Peaking services for the Gainesville and Columbus service areas were obtained as part of the current, extended Asset Management Agreement (discussed below). For the Columbus service areas, the Gas Supply Plan includes contracted peaking services in the amount of 4,900 Dth per day, which is part of a larger contract, the balance of which is not included in this Gas Supply Plan, The Company has also contracted for 4,500 Dth per day for the Gainesville territory, which is part of a larger contract, the balance of which is not included in this Gas Supply Plan. Liberty has not included all of the contracted-for citygate bundled services, but rather only the portion required to achieve a 5% reserve margin. Notwithstanding the additional contracted-for citygate bundled services, the Company is not seeking an increase to the historical 5% reserve margin criteria for its Gas Supply Plan.

Given the present authority and contracts, the Company does not require any other authorizations from the Commission for the 2025-2026 Gas Supply Plan.

6. Hedging.

a) Liberty may continue to utilize a rolling 12-18 month hedging implementation period that is layered ratably over the entire period, unless there are extraordinary events in any given month, for up to 30% of the anticipated winter purchases (the "Authorized Amounts"), which for the 2025 – 2026 winter is approximately 500,000 DTH.[1] In the event of such an extraordinary event that warrants a suspension or acceleration of planned hedging volumes, the Company will file information with the Commission within thirty (30) days regarding the occurrence of any such extraordinary event. Additionally, the Company may hedge up to one-third of the Authorized Amounts (that is, up to 10% of the anticipated winter purchases, which for each of the 2025 – 2028 winter periods is approximately 175,000 DTH[2]) for as much as three winters in advance. These three-winter-ahead hedges may be done in fewer transactions than the other authorized hedging transactions (e.g., the 12-18 month hedging implementation

[1] *See* Revised Exhibit III (July 17, 2025), page 4 of the Company's Gas Supply Plan filing, sponsored by the revised pre-filed direct Testimony of Martin DeBruin, filed July 17, 2025, and the final updated testimony filed on July 22, 2025, in this docket.

[2] Id.

period that is layered ratably over the entire period), based on the Company's assessment of market conditions.

b) The costs associated with the approved hedging program shall be recovered through the PGA factor pursuant to O.C.G.A § 46-2-26.5.[3]

c) Liberty shall continue to maintain records involving all hedging transactions on a monthly basis and submit a report to the Commission after the end of each calendar quarter. The report shall identify each hedging contract, the date of the transaction, the cost of the transaction, and the price reflected in the contract. These reports shall be filed no later than fifteen (15) days after the last day of each quarter.

7. The Performance-Based Rate ("PBR") program.

a) The Company shall continue the PBR program under the current terms and conditions beginning October 1, 2025, and continuing through September 30, 2026.

b) The Company shall also continue the monthly PBR filings.

8. Status of Supply and Asset Management Agreements (AMAs).

The Company typically has contracted for its Georgia base load and storage supplies under one or more Commission-authorized Supply and Asset Management Agreements ("AMAs"). In the last Gas Supply Plan, the then current AMAs for both the Gainesville service areas and the Columbus service areas, were scheduled to expire at the end of the Gas Supply Plan year on September 30, 2025. However, pursuant to authority granted in the Order approving the 2024-2025 Gas Supply Plan, Liberty was authorized, in its sole discretion after consultation with Staff, to extend the existing AMA on no less favorable terms by amending the current AMA without issuing new RFPs for up to three additional years. With consultation from the Staff, Liberty extended the current AMA for two (2) additional years under the same terms and conditions except that the Company was able to attain additional maximum daily quantities ("MDQs") in its Peaking Agreements. For this 2025-2026 Gas Supply Plan, no additional authority is needed or being requested.

9. Payment and/or Reimbursement of Certain Expenses.

The Parties request that certain Commission Staff education, training, travel, and related expenses up to $20,000.00 during the 2025 – 2026 Gas Supply Plan Year be approved for payment by Liberty or reimbursed by Liberty. The amounts paid by the Company for these expenses shall be deemed a necessary cost of providing service, and Liberty shall

[3] The first five hedging programs for United Cities and Atmos Energy (following the acquisition of United Cities by Atmos Energy) were authorized pursuant to O.C.G.A § 46-2-20, in response to Applications filed by the United Cities and/or Atmos Energy requesting authority to engage in hedging in order to mitigate some of the price volatility of natural gas commodity (*See* Docket Numbers 14155, 14992, 16864, 18631, and 20115). In each of those dockets, the Company was authorized to book the difference in the hedged price and the benchmark price to Account 191 Deferred Gas Costs). Beginning with the 2006 - 2007 Gas Supply Plan Year (Docket No. 22874), Staff and Atmos Energy agreed, and the Commission approved, that the hedging programs should be included within the Gas Supply Plan filings. Hedges are transactions involving rights to buy and sell natural gas. As such, costs related to hedging are "purchased gas costs" as defined in O.C.G.A § 46-2-26.5(a)(7). Permitting recovery of hedging costs in this Stipulation is consistent with the well-established Commission precedent of including such costs as purchased gas costs when the hedging program is part of an approved gas supply plan (*See, e.g.,* Docket Numbers 55650, 45083, 44392, 43811, 42965, 42316, 41870, 41154, 39388, 38137, 36794, 35876, 34118, 31492, 29554, and 27168).

be entitled to recover the full amount of any cost charges to the Utility pursuant to O.C.G.A. 46-2-33.

10. Request for Commission Approval.

The Parties request that the Commission approve the Company's 2025 – 2026 Gas Supply Plan as filed on July 1, 2025, and amended by the Company on July 17, 2025, and as further modified by the provisions set forth in this Stipulation. If this Stipulation is not accepted by the Commission in accordance with the provisions hereof, this Stipulation shall be void and of no further effect and shall not prejudice any position taken by either Party and shall not be admissible evidence in this or in any other proceeding.

Agreed to this 2nd day of September 2025.

Title: *Director, Natural Gas Unit*	Title*: President*
On behalf of	On behalf of
Georgia Public Service Commission Staff	Liberty Utilities (Peach State Natural Gas) Corp.