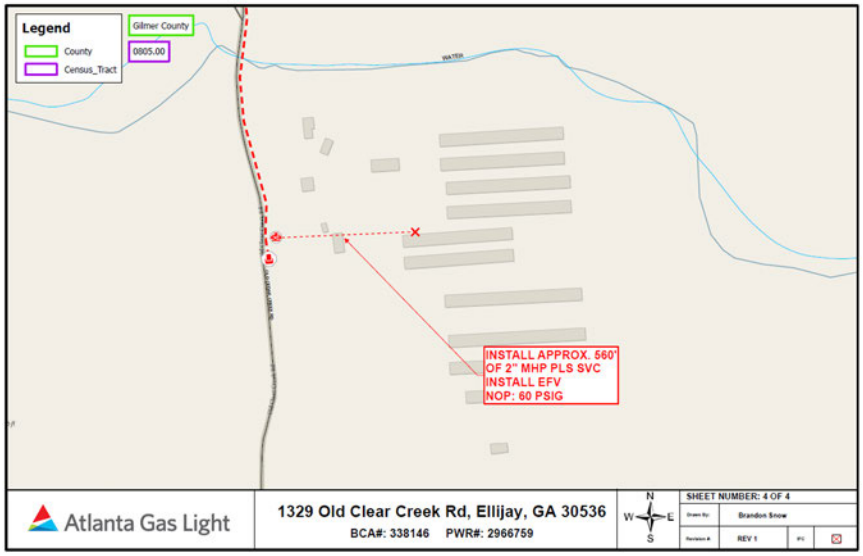
Atlanta Gas Light Company
Petition to Approve 2022 Universal Service Fund Facilities Expansion Plan
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Amended 2026 Plan (Filed February 13, 2026)

STF-18-1 Regarding the Gilmer County Project, the Minimum Filing Requirements ("MFR"), MFR-1 provided a technical description of each project and MFR-4 provided maps.

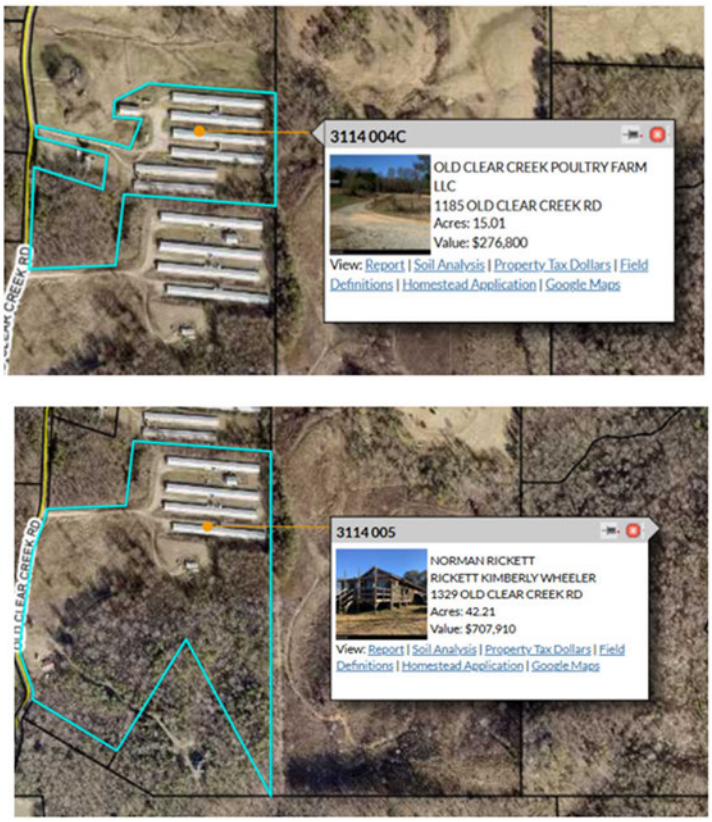
MFR-1 described this project potentially providing natural gas service to four (4) poultry houses that are part of the Old Clear Creek Poultry Farm. The project called for 1,665 feet of 6" plastic main (MAOP 60 psi) along Parker Road to the intersection of Parker Road and Old Clear Creek Road, approximately 3,500 feet of 4" plastic main (MAOP 60 psi) south along Old Clear Creek Road, and approximately 560 feet of 2" plastic service line to serve the facilities. In total, the project would consist of 5,165 of approach main and 560 feet of service line. When reviewing the MFR-4 map, it shows the service line extending to one poultry house on the property of six (6) poultry houses. See **Exhibit-1** below.

Exhibit-1: MFR-4 Map Gilmer County Project



When the Staff reviews the property on QPublic.net, see **Exhibit-2** below, the property is owned by Old Clear Creek Poultry Farm, but the address is 1185 Old Clear Creek Rd. The MFR-4 map shows the address 1329 Old Clear Creek Rd, which is the adjacent property below Old Clear Creek Farm, and it is owned by Norman and Kimberly Rickett. The Staff notes that the Rickett's property has four (4) poultry houses as descripted in AGL's MFR-1.

Exhibit-2: QPublic.net Map



Please answer the following:

a. Please update MFR-1 and MFR-4 as needed to provide the correct information of the property were natural gas service will is proposed.

b. Please provide a Rule-8 line extension analysis developing estimated revenues, unit costs, allowable investment, and cost to serve, and the CIAC required by the customer. Use the process found in **Staff-Attachment-1**, Oconee County Project.

c. As part of MFR-1 and MFR-5, AGL stated that 20 to 25 jobs will be created as a result of this line-extension. Since this is an existing poultry farm, how does switching from propane to natural gas create these new jobs?

d. With the creation of these new jobs, what is the increased tax base?

e. MFR-1 stated that the increase natural gas load will be 5.2 dekatherms a day. Would the annual estimated increase in gas load result in 1,898 dekatherms a year?

f. Regarding 1329 Old Clear Creek Rd and 1185 Old Clear Creek Rd, is there a family or business relationship between the owners of the two addresses

RESPONSE

a. The correct address is 1185 Old Clear Creek Road. The address does not appear in MFRs 1 or 5. AGL will correct the address in attachments MFR-4, MFR-6, and MFR-7.

b. Please see Staff-Attachment-1.

c. As stated in the as-filed MFR-1, the farm is not currently operational and previously utilized LP-gas. The poultry farm plans to create more than 20 jobs once the farm is operational.

d. The increased tax base is estimated at $100,000 per year.

e. The incremental gas load is estimated to be 5.2 dekatherms per hour based on the equipment planned for use by the customer. The filing inadvertently stated 5.2 dekatherms per day in MFR-1. An accurate annual incremental gas load will be determined when AGL has actual usage records for the customer.

f. AGL has no knowledge of the relationship between the potential customer and their neighbor, if any.

Respondent: William "Billy" Horne
Director, Resource Planning and Economic Development
Southern Company Gas

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STF-18-2 For the past ten (10) years, 2015 – 2025, how many poultry farms, or poultry houses, has AGL served with natural gas service with the following breakdown:

a. USF: # of Customers____ Location:_____ Cost:_____

b. Rule-8: # of Customers____ Location:_____ Cost:_____

c. ECON-1: # of Customers____ Location: _____ Cost:_____

d. CGP: # of Customers____ Location: _____ Cost:_____

RESPONSE

The Company would like to provide Staff with the information requested; however, AGL does not maintain project records in the format Staff requested in STF-18-2. For instance, a poultry project done through ECON-1 included other non-poultry entities, so an accurate apportionment of costs cannot be calculated. Additionally, AGL is unclear if Staff is asking for new poultry farms or all poultry farms that have been served over the last 10 years. To the extent STF-18-2 intends to request information on projects for poultry farms approved under USF or ECON-1, that information is equally available to Staff as it is to the Company.

Respondent: William "Billy" Horne
Director, Resource Planning and Economic Development
Southern Company Gas

STF-18-3 Regarding MFR-6 for the Gilmer County Project, please answer the following:

a. AGL listed a meter set cost of $8,794. Reviewing past USF and ECON-1 project filings, larger Commercial customers, when provided, had comparable costs for meter sets. Though some larger Commercial customers had lower estimates. Why would a meter set for a small poultry farm have similar costs for meter set as larger Commercial customers? Do meter sets have a range of costs based on estimated gas load?

b. MFR-6 shows a contingency of 10%, but MFR-7 shows a contingency of 50%/30%. Which is the correct estimate?

c. Regarding MFR-6 Cost to Serve for the Gilmer County Project, AGL used income tax and finance ratios consistent with 2025. On January 30, 2026, AGL filed updated ratios for 2026. Likewise, the Staff found that the Gilmer County Project engineering estimates were rounded and didn't provide exact dollar amounts. As found in **Exhibit-3** below, does AGL agree with Staff's updated Cost to Serve dollar amount for the Gilmer County Project?

Exhibit-3: Staff Updated Cost to Serve – Gilmer County Project

Line	Type	Project	Footage Size/Type	Estimated Engineering Costs*	Income Tax Gross-Up	Financing Cost Gross-Up	Cost to Serve	Income Tax Ratio	Finance Ratio
1	Commercial	Gilmer	1,665' x 6" plastic 3,500' x 4" plastic 560' x 2" plastic	$ 502,074.49	$ 78,584.70	$ 3,057.63	$ 583,716.82	0.15652	0.00609

RESPONSE

a. AGL is unaware of which specific projects Staff used to make this comparison. Nonetheless, the meter cost estimate is based upon the estimated current costs necessary to construct a meter set to deliver the required load and delivery pressure to this particular customer.

b. The term "contingency" and the +50%/-30% interval are two different things. Contingency refers to a specific allowance within a construction estimate that contemplates project scope changes that may occur during construction. The +50%/-30% is not a contingency percentage. AGL has discussed the Asset Development Process ("ADP") utilized by AGL to generate construction estimates with Staff in the

past. To recap a portion of these discussions, ADP consists of five stage gates that develop and refine project estimates. ADP prescribes that the first stage gate includes a +50%/-30% interval to account for unknowns that cannot be foreseen in preparing a stage gate 1 estimate. As the project progresses, the estimate is refined through stage gates 2 through 5 as unknowns are identified. Stage gate 1 estimates are typically presented to the Commission with USF projects.

c. AGL agrees with Staff's updated estimated Cost to Serve.

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STF-18-4 Related to the Coweta County project, please answer the following:

a. MFR-6 shows a contingency of 10%, but MFR-7 shows a contingency of 50%/30%. Which is the correct estimate?

b. Regarding MFR-6 Cost to Serve for the Coweta County Project, AGL used income tax and finance ratios consistent with 2025. On January 30, 2026, AGL filed updated ratios for 2026. Likewise, the Staff found that the Cowtea County Project engineering estimates were rounded and didn't provide exact dollar amounts. As found in **Exhibit-4**, does AGL agree with Staff's updated Cost to Serve dollar amount for the Coweta County Project?

Exhibit-4: Staff's Updated Cost to Serve – Coweta County Project

Line	Type	Project	Footage Size/Type	Estimated Engineering Costs*	Income Tax Gross-Up	Financing Cost Gross-Up	Cost to Serve	Income Tax Ratio	Finance Ratio
2	Commercial	Coweta	2,300' x 4" plastic 450' x 1-1/4" plastic	$ 381,455.77	$ 59,705.46	$ 2,323.07	$ 443,484.29	0.15652	0.00609

RESPONSE

a. See response to STF-18-3(b).

b. AGL agrees with Staff's updated estimated Cost to Serve.

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STF-18-5 Regarding AGL's petition, it had a footnote that stated the following:

[1] The customer for the proposed Gilmer County Project is a limited liability company whose sole member is a current AGL employee. Consideration for the Gilmer County Project was conducted without knowledge of this fact, and the project was treated in the same manner as all other projects considered under Commission Rule 515-7-5-.07.

Please answer the following:

a. Please provide the name of the AGL employee that requested natural gas service.

b. At the time the Field Serve Representative was contacted by, and met with this potential customer, did the rep become aware this person was an employee of AGL?

c. At what point in the process was it determined that the person requesting natural gas service was an AGL employee?

d. Did AGL conduct an internal legal review to determine if there was a conflict of interest in providing a line-extension to an AGL employee?

RESPONSE

a. The AGL employee, who is a member of the LLC requesting service, is [redacted].

b. A Field Representative was not contacted. At the time the Account Representative was contacted, he was aware that an AGL employee was a member of the LLC requesting service. However, the Director of Economic Development considered and included the project in the filing with knowledge that the customer submitting the request was an LLC, without knowing ownership of the LLC. Projects submitted for consideration do not contain information regarding ownership of an LLC. The Director of Economic Development subsequently became aware of the AGL employee's ownership of the LLC and added a footnote to the filing to disclose the information.

c. See response to STF-18-5(b).

d. AGL consulted with legal to determine the best way to inform Staff of this situation. Nothing precludes or prohibits an AGL employee from obtaining natural gas service from AGL. Further, no rule or statute prohibits an AGL employee from seeking or obtaining natural gas service through the USF.

As stated in the Petition, this potential customer received the same treatment as any other potential USF customer during the process of preparing the project filing and was not consulted at any time during preparation of the project filing.

Respondent: William "Billy" Horne
Director, Resource Planning and Economic Development
Southern Company Gas

STF-18-6 Currently, does the poultry houses along Clear Creek Rd and Parker Rd along route of the existing main have natural gas service. If so, what addresses currently have natural gas service.

RESPONSE

See Attachment MFR-4: Maps of Proposed Corridors_ Gilmer. There is no existing gas service on Old Clear Creek Road. There are three active accounts on the segment of Parker Road containing natural gas infrastructure currently served by AGL.

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STF-18-7 Has AGL contacted owners of poultry farms along Parker Rd and Old Clear Creek Rd proposed route to determine if they desire natural gas service, in additional this proposed customer?

RESPONSE

AGL visited one other poultry operation near the proposed route and the owner of that facility declined to be included in this proposal. However, AGL always seeks to add customers to its system. If any additional potential customers exist in this area, AGL will identify them and endeavor to connect them to the system should this project be approved.

Respondent: William "Billy" Horne
Director, Resource Planning and Economic Development
Southern Company Gas