

**BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION
STATE OF GEORGIA**

IN RE:

**ATLANTA GAS LIGHT COMPANY'S
2025-2034 INTEGRATED CAPACITY
AND DELIVERY PLAN**

Docket No. 43820

**ATLANTA GAS LIGHT COMPANY'S PETITION TO AMEND 2025-2034
INTEGRATED CAPACITY AND DELIVERY PLAN**

Atlanta Gas Light Company (“AGL” or the “Company”) files this Petition with the Georgia Public Service Commission (the “Commission”), requesting two amendments to the 2025-2034 Integrated Capacity and Delivery Plan (the “2025-2034 i-CDP”). Such Amendments will have no effect on either the authorized rate adjustments or aggregate capital budgets established in the Commission’s July 2, 2024 Order approving the 2025-2034 i-CDP. In support of these Amendments, AGL has included herewith the Amended Minimum Filing Requirements (“MFRs”). AGL respectfully requests that the Commission approve the amendments to the 2025-2034 i-CDP.

I. BACKGROUND

In the Commission’s February 23, 2021 Order Adopting Stipulation in Docket No. 42315, the Commission approved the Stipulation that Staff and AGL (the “Governance Document”) submitted proposing a long-range planning tool to establish a proceeding in which the Commission will examine and approve the parameters for capital budgets and related O&M spending associated with multi-year (*i.e.*, more than three years) forecasts. The Governance Document allows the Company to file for the Commission’s consideration a comprehensive planning tool, referred to as

the Integrated Capacity Delivery Plan (“i-CDP” or the “Plan”), to help ensure consistency and continuity of the forecasts, assumptions, selected options, and other planning parameters that the Company presents and the Commission approves within the independent Capacity Supply Plan (“CSP”) and Georgia Rate Adjustment Mechanism (“GRAM”) processes. The Commission approved the Company’s first i-CDP, the 2022-2031 i-CDP, on November 18, 2021, by adopting the stipulation and addendum to stipulation that the parties reached.

The Commission approved AGL’s 2025-2034 i-CDP on July 2, 2024, by adopting the stipulation the parties reached (the “Stipulation”).¹ This Stipulation established the roadmap for AGL’s operations during the Plan Period for calendar years 2025 to 2034. In the July 2, 2024 Order in Docket No. 43820 (the “July 2024 Order”),² the Commission found that AGL’s Stipulation was “a fair and reasonable resolution” for the Planning Period of the 2025-2034 i-CDP.

In the 2025-2034 i-CDP, the Commission approved budgets for projects and programs, as labeled in the Stipulation. Within these individual budget categories, the Stipulation authorizes AGL, without further action, to reallocate capital across the GRAM—Safety and Compliance and GRAM—Other Budget Categories as necessary to address evolving needs and priorities.³ Further, the Stipulation states that the Company has the authority where necessary and appropriate to reprioritize projects, shift budgeted funds among authorized projects, and address new or reassessed risks, costs, and priorities.⁴ AGL proposed, and the Commission approved, budget parameters based on information available at the time of filing. Based on the information available in 2024, the Commission found that the budget estimates were reasonable and appropriate to meet

¹ Order Adopting Stipulation, *Atlanta Gas Light Co.’s 2025-2034 Integrated Capacity and Delivery Plan*, Docket No. 43820 (G.P.S.C. July 2, 2024) (the “July 2024 Order”).

² *Id.*

³ Stipulation at 10.

⁴ *Id.* at 6.

customers' needs. AGL incorporated current economic trends into the Commission approved 2025-2034 i-CDP based on available information; however, because of changed circumstances, AGL seeks amendments to the 2025-2034 i-CDP.

II. AMENDMENTS TO THE 2025-2034 i-CDP

AGL seeks two amendments to the 2025-2034 i-CDP. For the first amendment, the Company requests to add four (4) tap stations and one (1) Riverdale LNG tap meter to the 2025-2034 i-CDP to the System Reinforcement Rider ("SRR") for recovery. For the second amendment, the Company requests to have the 2025 – 2027 Georgia Rate Adjustment Mechanism ("GRAM") capital budget, the 2025 – 2027 SRR capital budget, and the 2025 – 2027 Liquefied Natural Gas ("LNG") Tracker capital budget combined to allow capital budget over-spending related to the LNG Tracker to be netted against the capital budget under-spending in the GRAM and SRR. Section 5 of the Governance Document states:

Certain factors and circumstances may require AGL to deviate from an approved i-CDP. Examples of such factors and circumstances could include, but not be limited to, changes to FERC-regulated interstate suppliers' planned additions that affect a planned AGL intrastate project, new compliance regulations, newly discovered risks, revised assessments of previously known risks, shifts in customer growth and retention patterns, accelerated local, state and federal infrastructure projects, and other factors that require that AGL reprioritize projects within an existing i-CDP. If a deviation from the approved i-CDP is inconsistent with the approved i-CDP, an amendment is required. Additionally, if AGL cannot meet the needs of its customers' and continue to provide safe and reliable service within the parameters for capital budgets and related O&M spending established in the then-existing i-CDP as approved by the Commission, the Company will seek approval to amend the i-CDP.

These proposed amendments are intended to provide for the addition of the approved new gas capacity into AGL's system, adjust for some System Reinforcement pipeline project timeline changes due to land access and other challenges, account for FERC interstate pipeline additions that impact planned AGL intrastate projects, and address reasonable but unplanned cost increases

on the Cherokee LNG Expansion project. AGL is mindful of its commitment to manage the Company using authorized revenues and, under the proposed amendment, AGL will not exceed the authorized aggregate capital budgets (the budgets within the approved i-CDP specifically exclude DOT and ECON-1 Rider projects).

1. Amendment to Add Four (4) Tap Stations and One (1) Riverdale LNG Tap Meter to the 2025-2034 i-CDP SRR Projects

AGL seeks an amendment to upgrade four (4) tap stations and one (1) Riverdale LNG tap meter to the SRR for recovery. These projects are related to Southern Natural Gas Company, L.L.C. (“SNG”) and Transco upgrading their systems to bring additional natural gas capacity to Georgia.

A. Southern Natural Gas South System Expansion 4 Project (“SSE”)

The SSE will consist of (14) fourteen new natural gas pipeline loops (noncontiguous) that run parallel to SNG’s existing pipeline, South Main Line, totaling approximately 279 miles primarily along existing pipeline in Mississippi, Alabama, and Georgia. The Project also includes expansions to (13) thirteen existing compressor stations and (5) five new meter or regulator stations and modifications to (11) eleven existing meter stations. The planned project would create up to approximately 1.3 million dekatherms per day of capacity on SNG’s pipeline system.⁵The project is designed to increase SNG's South Main Line capacity by approximately 1.3 Bcf/d and will help meet growing power generation and local distribution company demand in the Southeast. SSE4 will be completed in two phases and is almost entirely comprised of brownfield looping and horsepower compression additions on the SNG and EEC pipeline systems. Assuming the timely receipt of all required permits and approvals, Kinder Morgan, Inc. expects to place the first phase

⁵ Federal Energy Regulatory Commission, "South System Expansion 4 Pipeline Project," accessed April 9, 2026, <https://www.ferc.gov/south-system-expansion-4-pipeline-project>.

of the project in service in the fourth quarter of 2028 and the second phase in the fourth quarter of 2029.⁶

For AGL's distribution system to take advantage of the benefits provided by the SSE, the Company is requesting to upgrade three (3) tap stations that consist of: (1) Riverdale #1; (2) Augusta #2; (3) Augusta #3. Likewise, these three (3) tap stations were approved for MAOP reconfirmation as part of the 2025 – 2034 i-CDP to be recovered in the Company's GRAM. With the upgrade of these tap stations, the MAOP reconfirmation will be accomplished, and there will be no additional costs recovered in the GRAM. Additionally, the Riverdale LNG tap meter project will allow Transco gas to supply AGL's Riverdale LNG plant, allowing additional flow of SNG gas directly into the AGL system during liquefaction operations.

B. Transco South East Supply Enhancement Project ("SEP")

The proposed project is an expansion of the existing Transco capacity in the southeastern United States. The project will include pipeline looping adjacent to the existing Transco corridor and modifications to eight (8) facilities. This expansion will provide reliable natural gas deliveries to Virginia, the Carolinas, Georgia, and Alabama to meet the growing residential, commercial, and industrial demand in cities across the Mid-Atlantic and Southeast.⁷ For AGL's distribution system to maximize the benefits provided by the SEP, the Company will need to upgrade the Riverdale LNG tap meter. Currently, the Riverdale LNG facility has a single meter for SNG only. The upgrade will allow gas from both SNG and Transco.

⁶ Kinder Morgan, "South System Expansion 4 Project," accessed April 9, 2026, <https://www.kindermorgan.com/Operations/Projects/SSE4-Project-Page>.

⁷ The Williams Companies, Southeast Supply Enhancement Fact Sheet (February 19, 2025), https://www.williams.com/wp-content/uploads/sites/14/2026/01/SSE-Fact-Sheet-2_19_25.pdf.

C. Brunswick/Bordertown Tap Station

Similarly, changes since the approval of the 2025-2034 i-CDP require that the original plans for the fourth station (the Brunswick – Border Town Station) be revised. The tap station has obsolete equipment, needs more capacity, and MAOP Reconfirmation. The station design capacity needs to be increased from 2,155 MCFH to 3,000 MCFH to meet expected customer needs, which in turn requires increasing certain existing pipes and equipment to accommodate the increased capacity needs.

D. Necessity of the Amendment

This amendment is necessary because AGL must expand its facilities to be able to receive and redeliver 275,000 Dth/day of additional Transco and SNG capacity into its system by 2027/2028. The Company considered this additional capacity at the time it filed the 2025-2034 i-CDP, as outlined in Chapter 4, page 32 of AGL's 2025-2034 i-CDP, but neither Transco's nor SNG's proposed interstate pipeline expansion projects were guaranteed to move forward at the time of filing and the receipt points on AGL's system had not been identified or designed at that time. Since the i-CDP filing, the SNG and Transco capacity increases have been formalized and AGL's participation in each have subsequently been approved in AGL's 2025-2028 Capacity Supply Plan.⁸ In order for the Company to accept the additional supply at the necessary locations for system needs, multiple tap stations must be expanded or replaced. The upgrades to the Riverdale #1, Augusta #2, and Augusta #3, tap stations will allow the Company to take delivery of the new SNG capacity from the SSE4 expansion into AGL's system. The Riverdale LNG tap meter upgrade is needed to allow gas from both SNG and Transco to feed into the Riverdale LNG

⁸ Final Order Adopting Parties' Stipulation, *Atlanta Gas Light Co.'s 2025-2028 Capacity Supply Plan*, Docket No. 56177 (G.P.S.C. Sept. 17, 2025).

plant. Currently, there is a connection between the Riverdale #1 station and the LNG plant that includes a meter set to measure the SNG gas feeding the plant. This meter set needs to be rebuilt due to pressure and flow changes associated with the new SNG supply and ongoing liquefaction system upgrades at the plant. In addition to this existing SNG connection, AGL will install the necessary piping and a new meter set to connect Transco gas to the LNG plant. The Riverdale LNG tap meter project includes both the replacement of the SNG metering facilities and the addition of the new interconnect and metering for gas from Transco. Once both are completed, AGL will be able to better utilize the capacity additions from Transco and SNG to support both LNG storage and pipeline system needs. The upgrades to the Brunswick/Bordertown tap station are needed to replace obsolete equipment, address MAOP reconfirmation issues, and to provide for additional throughput necessary to support increasing customer usage in the area.

A larger Brunswick – Border Town Station will serve the needs of new and existing customers and provide greater operational flexibility for AGL’s existing capacity rights on SNG and Magnolia Pipeline Project.

AGL will complete the proposed SRR projects under existing project numbers. These SRR projects have an estimated cost of \$33.4 million, and the SRR budget category is currently \$62 million under budget. The underspent SRR is a result of a few projects that came in lower than original estimates based on changing market conditions, as well as significant delays on some key System Reinforcement pipeline projects primarily due to land access and related challenges. AGL is working to resolve these land issues as outlined below, but this has resulted in an SRR underspend in 2025 and expected continued challenges in 2026 and 2027. While these challenges are delaying the resolution of the issues driving these projects as outlined in the 2025-2034 i-CDP MFR document, they are providing room within the SRR to include the proposed four (4) SRR tap

station projects and one (1) Riverdale LNG tap meter outlined above while staying within approved SRR investment levels.

For example, the most significant System Reinforcement pipeline project delay has been on the approved Cumming to McGinnis project. This project involves adding an additional pipeline within a current easement to allow for the flow of the remaining increased capacity of the Cherokee LNG Expansion project into the surrounding system and to address area pressure issues as outlined in the 2025-2034 i-CDP MFR document. These delays have been exacerbated by the additional unsuccessful work to try and find an alternate route that did not cross the local municipal gas company's territory and then the need for approval under the Commission's safety rules for the additional pipeline installation running adjacent to and intersecting pipeline systems. In addition to schedule-related delays on certain System Reinforcement pipeline projects, AGL has also experienced lower-than-forecasted project costs on other approved projects during 2025. These favorable variances are primarily attributable to competitive construction bids received below original estimates and limited route refinements that reduced construction complexity and overall project scope. Collectively, these favorable cost outcomes and project delays provide additional flexibility within the approved 2025-2027 i-CDP budget framework to support the addition of four (4) new upgrades to tap stations and one (1) Riverdale upgrade to the LNG tap meter.

Additional details for each of these stations is provided in the Minimum Filing Requirements ("MFR") document as required by the i-CDP Governance Document for all System Reinforcement projects.

2. Amendment for a 2025 – 2027 GRAM, Cherokee LNG, and SRR Capital Budget Combined Review Request

A. Combined Capital Budget Review

During the July 2, 2024 Administrative Session, the Commission approved AGL’s 2025 – 2034 i-CDP. This included the approval of the 2025 – 2027 capital budgets. In Table-1 below, the approved capital budgets are provided for GRAM, LNG Tracker, and SRR budget categories taken from Attachment-A of the Final Order. AGL seeks an amendment for a “2025 – 2027 GRAM, SRR, and LNG Tracker capital budget combined review.” The focus is on combining the total three-year (2025 – 2027) approved GRAM, SRR, and LNG Tracker capital budgets to allow any capital spending that exceeds the 3-year LNG Tracker capital budget total to be absorbed by the 3-year GRAM and SRR capital budget total not used because of projected lower actual GRAM and SRR capital spending.

As seen in Table-1 below, the approved combined 3-year capital budgets between GRAM, SRR, and the LNG Tracker is \$1.87 billion. The combined actual capital spending from the GRAM, SRR, and the Cherokee LNG Tracker shall not exceed the approved combined three-year total of the three capital budgets.

Table-1: I-CDP 2025 - 2034 i-CDP Capital Budgets (in millions)

	2025	2026	2027	Total
GRAM - Safety & Compliance (GRAM-S&C)	\$128.10	\$167.10	\$177.60	\$472.90
GRAM - Other than Safety & Compliance (GRAM-Other)	\$274.00	\$284.80	\$290.40	\$849.10
GRAM Total Capital Budgets	\$402.10	\$451.90	\$468.00	\$1,322.00
LNG - Cherokee LNG Expansion	\$39.80	\$0.00	\$0.00	\$39.80
LNG - Valdosta Satellite LNG	\$11.90	\$23.30	\$24.50	\$59.70
Total LNG Tracker Capital Budgets	\$51.60	\$23.30	\$24.50	\$99.40
RIDER - System Reinforcement Rider (SRR)-Actual Totals	- \$149.20	\$148.50	\$150.80	\$448.50
Total 2025 - 2034 I-CDP Capital Budgets	\$602.90	\$623.70	\$643.30	\$1,869.90

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****ECON-1 and DOT Capital Budgets not included.**

In Table-2 below, a revised forecast of the i-CDP capital budgets is provided. The Company has forecasted that by the end of 2027, the GRAM capital budget will have \$11.9 million forecasted underspending. By the end of 2027, the SRR capital budget will have \$62.8 million forecasted under-spending. With the additional SRR requested spending as part of this Petition, AGL has forecasted the additional spending at \$33.4 million. The adjusted forecast for the SRR is \$29.4 million in under-spending. The total forecasted GRAM and SRR under-spending by the end of 2027 is \$41.2 million. By the end of 2027, the LNG Tracker capital budget will have a forecasted 41.2 million overspend, which will be netted out by the combined GRAM and SRR forecasted underspend.

Table-2: 2025-2034 i-CDP Capital Budgets Revised Forecast

2025-2027 i-CDP Budget Category (Supply Stations in SRR)	2025			2026				2027					2025-2027 Total					
	i-CDP Settlement ¹	Actuals	Variance Over/(Under)	i-CDP Settlement ¹	Allowable Carry- Forward ²	i-CDP + Carry- Forwards	AGL Plan (Jan 26 Updates)	Variance Over/(Under) i-CDP+CF	i-CDP Settlement ¹	Allowable Carry- Forward ²	i-CDP + Carry- Forwards	AGL Plan (Jan 26 Updates)	Variance Over/(Under) i-CDP+CF	i-CDP Settlement ¹	Allowable Carry- Forward ²	i-CDP + Carry- Forwards	AGL Plan (2025 Act + Jan 26 Updates)	Variance Over/(Under) i-CDP+CF
GRAM-Total	402.1	380.2	(21.9)	451.9	21.9	473.8	456.9	(16.9)	468.0	16.9	484.9	473.0	(11.9)	1,322.0	0.0	1,322.0	1,310.1	(11.9)
SRR	149.2	131.1	(18.0)	148.5	18.0	166.5	119.5	(47.0)	150.8	47.0	197.8	135.0	(62.8)	448.5	0.0	448.5	385.7	(62.8)
SRR Stations - Add'l Supply ²	0.0	0.0	0.0	0.0	0.0	0.0	23.7	23.7	0.0	(23.7)	(23.7)	9.7	33.4	0.0	0.0	0.0	33.4	33.4
SRR - Total	149.2	131.1	(18.0)	148.5	18.0	166.5	143.2	(23.3)	150.8	23.3	174.1	144.7	(29.4)	448.5	0.0	448.5	419.1	(29.4)
Cherokee-LNG	39.8	58.8	19.1	0.0	(19.1)	(19.1)	22.2	41.2	0.0	(41.2)	(41.2)	0.0	41.2	39.8	0.0	39.8	81.0	41.2
Valdosta-LNG	11.9	6.0	(5.8)	23.3	5.8	29.1	28.0	(1.1)	24.5	1.1	25.6	25.6	0.0	59.7	0.0	59.7	59.7	0.0
Total-Excl. ECON-1 & DOT	602.9	576.2	(26.7)	623.7	26.7	650.3	650.3	0.0	643.3	(0.0)	643.3	643.3	0.0	1,869.9	0.0	1,869.9	1,869.9	0.0
1 - Table above is based on directs, OH, and AFUDC from the July 2024 i-CDP settlement.																		
2 - Proposed additional SRR Stations necessary to push new interstate capacity into AGL's system where needed																		
3 - The i-CDP allows for the carry-forward of underspend from one year to the next but does not allow for any carry-forward of unused funds beyond 2027, resulting in there being no Total Allowable Carry-Forwards.																		

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B. Purpose of the Combination Review Request

The Cherokee LNG Expansion project was proposed in 2020 and included in the 2022-2031 i-CDP. The Commission hired an independent engineering firm to review the project estimates, and the firm validated those estimates. The current total project estimates are within approximately ten percent of the budget that was developed and validated prior to the supply chain disruptions and inflationary labor and material increases associated with the pandemic. AGL has documented such increases through the quarterly LNG tracker updates. The Company believes

this project-to-date increase to be reasonable considering the U.S. Bureau of Labor Statistics data reports overall inflation during this same period to be approximately twenty-six percent.

III. CONCLUSION

AGL respectfully requests that this Commission issue an order approving its Petition to Amend the 2025-2034 i-CDP for 2026 and 2027 to approve two amendments. First, approve an amendment to allow the Company to add four (4) tap stations to the 2025-2034 i-CDP for SRR projects, removing them from the GRAM capital budget effective January 1, 2026, and the Company requests the Commission approve the upgrade of the Riverdale LNG tap meter to be recovered in the SRR and removed from the GRAM. Second, The Company requests the Commission approve an amendment to allow any capital budget over-spending related to the LNG Tracker to be netted against the capital budget under-spending in the GRAM and SRR.

The amendments requested by the Company are unique circumstances and have never been requested in the past. This request does not constitute a precedent for any future i-CDP requests.

Submitted this 14th day of May 2026.

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ATTACHMENT 1

2025-2027 i-CDP Budget Category (Supply Stations in SRR)	2025			2026					2027					2025-2027 Total				
	i-CDP Settlement ¹	Actuals	Variance Over/(Under)	i-CDP Settlement ¹	Allowable Carry- Forward ³	i-CDP + Carry- Forwards	AGL Plan (Jan 26 Updates)	Variance Over/(Under) i-CDP+CF	i-CDP Settlement ¹	Allowable Carry- Forward ³	i-CDP + Carry- Forwards	AGL Plan (Jan 26 Updates)	Variance Over/(Under) i-CDP+CF	i-CDP Settlement ¹	Allowable Carry- Forward ³	i-CDP + Carry- Forwards	AGL Plan (2025 Act + Jan 26 Updates)	Variance Over/(Under) i-CDP+CF
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Cherokee-LNG	39.8	58.8	19.1	0.0	(19.1)	(19.1)	22.2	41.2	0.0	(41.2)	(41.2)	0.0	41.2	39.8	0.0	39.8	81.0	41.2
Valdosta-LNG	11.9	6.0	(5.8)	23.3	5.8	29.1	28.0	(1.1)	24.5	1.1	25.6	25.6	0.0	59.7	0.0	59.7	59.7	0.0
Total-Excl. ECON-1 & DOT	602.9	576.2	(26.7)	623.7	26.7	650.3	650.3	0.0	643.3	(0.0)	643.3	643.3	0.0	1,869.9	0.0	1,869.9	1,869.9	0.0
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