BEFORE THE
GEORGIA PUBLIC SERVICE COMMISSION

In Re:	]	
SCANA Energy Marketing, LLC,	]	
Petitioner,	]	
v.	]	Docket No. 56177
	]	
Atlanta Gas Light Company,	]	
Respondent.	]	

EMC Natural Gas, Inc. And Texican Natural Gas Company's
Brief In Opposition To Atlanta Gas Light Company's Motion To Deny
Application To Intervene

EMC Natural Gas, Inc., dba True Natural Gas (hereafter "True Natural Gas" or "True") and Texican Natural Gas Company (hereafter "Texican"), file their response to Atlanta Gas Light Company's (hereafter "AGL's") Opposition to EMC Natural Gas, Inc. and Texican Natural Gas Company's Joint Application for Leave to Intervene. AGL's request should be denied.

Summary of Arguments

I. Atlanta Gas Light Company's Request Is Meritless Because True And Texican's Application to Intervene Is Not Out of Time, Good Cause Has Been Shown, and Their Interests Cannot Be Adequately Represented By SCANA

A. The Commission Has Not Issued a Procedural and Scheduling Order Regarding SCANA's Complaint or Made Any Determination How to Proceed with the Matter

B. Texican and True's Application for Leave to Intervene Clearly States They Were Adversely Impacted by the Transco Imbalance Penalties Which Cost Them Approximately $200,000.00

C. Texican and True Will Provide Additional Evidence That Will Give the Commission a Better Understanding of What Caused the Transco Imbalance Penalties

II. Conclusion

Argument And Citation of Authority

I. Atlanta Gas Light Company's Request Is Meritless Because True and Texican's Application to Intervene Is Not Out of Time, Good Cause Has Been Shown, and Their Interests Cannot Be Adequately Represented by SCANA

A. The Commission Has Not Issued a Procedural and Scheduling Order Regarding SCANA's Complaint or Made Any Determination How to Proceed with the Matter

Since SCANA filed its Complaint against AGL no action has been taken by the Commission regarding the matter. Both Texican and True were waiting on the Commission to either issue a procedural and scheduling order or create a separate investigatory docket or proceeding. Neither has occurred to date. Out of an abundance of caution, rather than waiting until the Commission declared its intent how to proceed, True and Texican filed their application to intervene. AGL has not been harmed in any way by True and Texican's application to intervene, but is now on notice of their interest in the matter.

The Commission has always been very open and receptive to parties intervening in cases or proceedings before the Commission. Just recently in Docket 56765 the Georgia WAND Education Fund Inc. filed its application[1] to intervene the day before the hearing in Georgia Power Company's Fuel Cost Recovery (FCR-27) Application, and its application to intervene was approved by the Chairman. Texican and True's application to intervene was not done at the last minute and will not cause AGL any surprise or

[1] Application of Georgia WAND Education Fund Inc. for Leave to Intervene, Docket No. 56765/Document No. 226546 (May 4, 2026)

harm, but their participation will provide more information and facts for the Commission to evaluate in deciding what reforms or changes need to be made to prevent another occurrence like December 15, 2025.

B. Texican and True's Application to Intervene Clearly States They Were Adversely Impacted by the Transco Imbalance Penalties Which Cost Them Approximately $200,000.00

Both Texican and True identified they were assessed "significant imbalance penalties" in their application to intervene pursuant to O.C.G.A. §46-2-59 (c). Approximately $200,000.00 in imbalance penalties were imposed upon True and Texican.[2] Two hundred thousand dollars in Transco penalties is a very real interest, and neither party wants to be exposed to these Operational Flow Order imbalance penalties again, especially because they had never incurred OFO imbalance penalties from Transco before December 15, 2025.

C. Texican and True Will Provide Additional Evidence That Will Give the Commission a Better Understanding of What Caused the Transco Imbalance Penalties

AGL argues at page 5 of its motion that any natural gas marketer charged the Transco penalties "must file their own complaints" rather than joining the SCANA proceeding. Filing multiple gas marketer complaints arising from the December 15, 2025, incident is overly burdensome to the affected marketers and a waste of the Commission's limited time and resources. Common sense and Commission precedent support having one docket or hearing to review the problem and consider reforms and changes to prevent a reoccurrence of the Transco penalties.

[2] Texican Natural Gas Company was assessed the OFO imbalance penalty by Transco as the approved asset manager for Walton EMC Natural Gas and CENNAT, Inc.

True and Texican's participation in a single docket will supplement the evidence presented by SCANA and present the Commission with a more complete understanding of the events and facts involved in this case. True and Texican's interests in this proceeding are similar, if not identical to SCANA's, to prevent a reoccurrence of the pipeline imbalance penalties, seek reimbursement, and make systemic changes to improve communications between natural gas marketers and AGL.

II. Conclusion

WHEREFORE, True and Texican respectfully request the Commission reject Atlanta Gas Light Company's motion to deny True and Texican's application to intervene, set a hearing to review SCANA's Complaint, and provide any other appropriate relief.

Respectfully submitted this 16th day of June, 2026.

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing **EMC Natural Gas, Inc. and Texican Natural Gas Company's Brief In Opposition To Atlanta Gas Light Company's Motion To Deny Application to Intervene** was filed in Docket 56177 with the Georgia Public Service Commission's Executive Secretary by the Commission's eFile system. An electronic copy of same was served upon all parties listed below by electronic mail, unless otherwise indicated, and addressed as follows:

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This 16th day of June, 2026.

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