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GEORGIA MUNICIPAL ASSOCIATION

August 11, 2026

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Georgia Public Service Commission
244 Washington Street, SW
Atlanta, Georgia 30334-5701

Re: Docket No. 56628-U - Request to Modify Cost Allocation Manual Filing Deadline

Dear Commissioners:

The Georgia Municipal Association (GMA) respectfully requests that the Commission modify one aspect of the Order entered in the above-referenced docket on June 18, 2026 ("Order").

The Order provides, in relevant part, that "the Cost Allocation Manual shall be filed with this Commission within 90 days after the close of each year." Following entry of the Order, several affected municipalities raised concerns regarding the practical administration of this provision. Because Municipal CLECs and their affiliated cities operate on a mix of calendar and fiscal year reporting periods, and because the Cost Allocation Manual filing incorporates both a City Official Certification and an Independent Accountant Certification, a single fixed day-count creates unnecessary scheduling difficulty for some jurisdictions.

We are submitting this formal request that the Commission amend the filing requirement to provide additional flexibility. Specifically, we ask that the Order be modified as follows:

Requested change: Replace the requirement that the Cost Allocation Manual "shall be filed with this Commission within 90 days after the close of each year" with a requirement that the Cost Allocation Manual be filed with the Commission on an annual basis, without specifying a fixed number of days following the close of the year.

We believe this approach best serves the Commission's underlying interest in ensuring regular, reliable annual reporting while accommodating the reality that Municipal CLECs' fiscal years, audit cycles, and independent accountant engagement timelines vary.

In the event the Commission prefers to retain a specific number of days rather than a generic annual requirement, we would alternatively propose that the deadline be extended from 90 days to 180 days after the close of each year, which municipal accountants have informed us would better align with the time reasonably needed to complete the independent accountant's examination and certification described in the Order.

We appreciate the willingness to discuss this matter and respectfully request that the Commission consider amending the Order accordingly. Please let us know if additional information or a formal motion is needed to effectuate this change.

Respectfully submitted,

Rusi C. Patel
General Counsel
Georgia Municipal Association

C: Leon Bowles