FILED
08/20/2026
Executive Secretary G.P.S.C.

IN RE:	APPLICATION OF TOWN SQUARE ENERGY FOR A NATURAL GAS MARKETER CERTIFICATE OF AUTHORITY	))))	DOCKET NO. 41840

STAFF'S TWENTY-FIFTH SET OF DATA REQUESTS TO TOWN SQUARE ENERGY

TO: AVI KEILSON
REGULATORY AFFAIRS
TOWN SQUARE ENERGY
520 BROAD STREET
NEWARK, NJ 07102

COMES NOW the Georgia Public Service Commission Staff (Staff) and, pursuant to the authority vested in it by the Georgia Public Service Commission (Commission) pursuant to O.C.G.A. § 46-2-57, herein propounds the following interrogatories and requests for production of documents (collectively, "data requests"), to be answered under oath by Town Square, or its designated representatives. Pursuant to Commission Utility Rule 515-2-1-.04, Staff requests that has **One Cover Sheet** and **One (1) Electronic Public Disclosure and Trade Secret version of the filing, which shall be made on the Commission Alternative e-Filing system ONLY containing an electronic version of its filing in Microsoft Word® for text documents or Excel® for spreadsheets.**

Please provide responses on or before 4:00 p. m. on September 21, 2026.

INSTRUCTIONS

a) These requests shall be deemed to be continuing. The Respondent is obliged to change, supplement, and correct all answers to requests to conform to available information, including such information as first comes available to the Respondent after the answers are hereto filed.

b) The answers provided should first restate the question asked and also identify the person(s) supplying the information.

c) All information is to be divulged that is within the knowledge, possession, control, or custody of the Respondent or may be reasonably ascertained thereby.

d) As used herein the "document" included, but is not limited to, the original and all copies (regardless of origin and whether or not including additional writing thereon or attached thereto) of memoranda, reports, books, manuals, instructions, directives, records, forms, notes, letters, notices, confirmations, telephone calls, meetings or other communications, bulletins, transcripts, diaries, analyses, summaries, correspondence and enclosures, circulars, opinions, studies, investigations, questionnaires and surveys, work sheets, and all drafts, preliminary versions, alterations, modifications, revisions, changes, amendments and written comments concerning the foregoing, in whatever form, stored or contained in or on whatever medium including computerized memory or magnetic media.

INFORMATION REQUEST

The requested information below shall be routinely requested on a quarterly basis and in accordance with Commission Rule 515-7-3-.07(7) and O.C.G.A. § 46-4-153(f).

6-months ending June 2026 (January – June)

***Please provide all responses in the Staff's Attachment-1 spreadsheet with one worksheet for each response labelled 1 - 28. If additional worksheets are needed, label as 1a., 1b., 1c. ….etc.**

Section-I. Financial Capability Data

STF-25-1 Using the Attachment-1 filed responses to the 24th Set, please update with the 2nd Q 2026 information. Yes or no, does the marketer continue to meet all financial capability requirements provided in Commission Rule 515-7-3-.07(7) and O.C.G.A. § 46-4-153(f)?

STF-25-2 Using the Attachment-1 filed responses to the 24th Set, please update with the 2nd Q 2026 information. Cumulatively, for each month of the 6-months ending June 2026 for the Georgia market, please provide a detailed income statement with totals for all the major categories such as revenues, costs, operating expenses, and net income. Please include all Firm and Interruptible activity that lists at a minimum of the following as an electronic Excel spreadsheet with live and unlocked formulas:

a. Revenues broken out by customer class and other revenues.
b. Cost of Sales Breakout
c. Lower Cost or Market (LCM) Activity
d. Hedging Financial Activities as an offset or addition to Cost of Sales
e. AGLC Base Charges
f. Operating Expenses
    i. General and Administrative
    ii. Marketing Expense
    iii. Interest Expense
    iv. Bad Debt Allowance
    v. Taxes
g. Net Income

When it comes to income statement categories, the marketer should not make major changes from quarter to quarter, and if a major change has taken place, it should be discussed how the new account categories fit with the previously filed information. Please break out each month separately.

STF-25-3 Using the Attachment-1 filed responses to the 24th Set, please update with the 2nd Q 2026 information. Cumulatively, for each month of the 6-months ending June 2026 for the Georgia market, please provide a detailed balance sheet with Firm and Interruptible activity that lists at a minimum of the following as an electronic. Please include a breakout of current assets and current liabilities:

a. Cash on Hand

b. Cash Equivalents

c. Receivables

d. Inventories

e. Detailed Current Assets Breakdown

f. Total Assets

g. Detailed Current Liabilities Breakdown

h. Accounts Payable

i. Short-Term

j. Long-Term Debt

k. Total Liabilities

l. Equity information

When it comes to balance sheet categories, the marketer should not make major changes from quarter to quarter, and if a major change has taken place, it should be discussed how the new account categories fit with the previously filed information. Please break out each month separately.

STF-25-4 Using the Attachment-1 filed responses to the 24th Set, please update with the 2nd Q 2026 information. Please provide the fiscal year dates used by the marketer and provide the most recent audit financials, if applicable.

STF-25-5 Using the Attachment-1 filed responses to the 24th Set, please update with the 2nd Q 2026 information. Cumulatively, for each month of the 6-months ending June 2026 for Georgia operations, beginning with the first day and ending with the last day of each month please provide the number of customers billed for each customer class--Residential, Commercial/Industrial, and Interruptible--separately for each

month within the period of January – June 2026. Beginning with the first day and ending with the last day of each month, please provide the number of therms billed for each customer class--Residential, Commercial/Industrial, and Interruptible--separately for each month within the period of January – June 2026. Please list this information as therms and not dekatherms.

Please provide the responses **in the format below as an Excel spreadsheet** with live and unlocked formulas:

Customer Count

Year 2026	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
Residential													
Commercial / Industrial													
Interruptible													
Total													

Therms

Year 2026	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total Therms
Residential													
Commercial / Industrial													
Interruptible													
Total Therms													

STF-25-6 Using the Attachment-1 filed responses to the 24th Set, please update with the 2nd Q 2026 information. If the Company has operations in other states, please list the states and the type of business activities.

STF-25-7 Using the Attachment-1 filed responses to the 24th Set, please update with the 2nd Q 2026 information. Please provide the most recent audited financials for the Georgia marketer (Georgia Only), if applicable.

STF-25-8 Using the Attachment-1 filed responses to the 24th Set, please update with the 2nd Q 2026 information. Cumulatively, for each month of the 6-months ending June 2026, if the Company has operations in other states, provide as an electronic Excel spreadsheet with live and unlocked formulas, please provide an income statement and balance sheet of total operations (Combined Georgia & Outside of Georgia).

STF-25-9 Using the Attachment-1 filed responses to the 24th Set, please update with the 2nd Q 2026 information. Please provide the most recent audited financials for the total company (Georgia & Outside Georgia), if applicable.

STF-25-10 Using the Attachment-1 filed responses to the 24th Set, please update with the 2nd Q 2026 information. Cumulatively, for each month of the 6-months ending June 2026, for the parent company or total operations, please provide a detailed income statement. Please total all the major categories such as revenues, costs, operating expenses, and net income.

a. All Revenues

b. Cost of Sales

c. Hedging Financial Activities as an offset or addition to Cost of Sales

d. AGLC Base Charges

e. Operating Expenses

i. General and Administrative

ii. Marketing Expense

iii. Interest Expense

iv. Bad Debt Allowance

v. Taxes

g. Net Income

When it comes to income statement categories, the marketer should not make major changes from quarter to quarter, and if a major change has taken place, it should be discussed how the new account categories fit with the previously filed information. Please break out each month separately.

*If the parent company is a publicly traded company, or issuer, please state the response as "Publicly Traded" and provide an electronic web address or link where the Staff can review the appropriate 10Q.

STF-25-11 Using the Attachment-1 filed responses to the 24th Set, please update with the 2nd Q 2026 information. Cumulatively, for each month of the 6-months ending June 2026, for the parent company or total operations, please provide a detailed balance sheet by month with all business activities that lists at a minimum of the following as an electronic Excel spreadsheet with live and unlocked formulas.

Please include a breakout of current assets and current liabilities:

a. Cash

b. Cash Equivalents

c. Receivables

d. Inventories

e. Detailed Current Assets Breakdown

f. Total Assets

g. Detailed Current Liabilities Breakdown

h. Accounts Payable

i. Short-Term and Long-Term Debt

j. Total Liabilities

k. Equity information

When it comes to balance sheet categories, the marketer should not make major changes from quarter to quarter, and if a major change has taken place, it should be discussed how the new account categories fit with the previously filed information. Please break out each month separately.

*If the parent company is a publicly traded company, or issuer, please state the response as "Publicly Traded" and provide an electronic web address or link where the Staff can review the appropriate 10Q.

STF-25-12 Using the Attachment-1 filed responses to the 24th Set, please update with the 2nd Q 2026 information. Please answer the following concerning financial support.

a. If the marketer has received any loans from its parent company, please provide the dollar amount of the loans.

b. If the marketer has received any equity investment from the parent company, please provide the dollar amount.

c. If the marketer has received any other financial support from the parent company, please describe the financial support, such as credit facilities, assets, debt relief, letters of credit, or money pool access.

d. Has the marketer received any financial support from an affiliate company or subsidiary? If so, please state the entity and describe the support.

STF-25-13 Using the Attachment-1 filed responses to the 24th Set, please update with the 2nd Q 2026 information. Currently, related to continuing as an ongoing concern, is the Georgia marketer, or its parent company, engaging in, or considering, a Chapter 7 or Chapter 11 proceeding, or other similar proceeding, in Georgia or other States? If yes, please provide a detailed explanation.

STF-25-14 Using the Attachment-1 filed responses to the 24th Set, please update with the 2nd Q 2026 information. Due to its continued financial performance or financial goals, does the marketer have concerns about continuing operations in Georgia? Please explain.

Section-II: Technical Capability Data

STF-25-15 Using the Attachment-1 filed responses to the 24th Set, please update with the 2nd Q 2026 information. Yes or no, does the marketer continue to meet all technical capability requirements provided in Commission Rule 515-7-3-.07(7) and O.C.G.A. § 46-4-153(f)?

STF-25-16 Using the Attachment-1 filed responses to the 24th Set, please update with the 2nd Q 2026 information. Regarding AGL's credit requirements, please answer the following:

a. What is the current credit requirement from AGL?

b. What method is used to meet the AGL credit requirement and what financial institution is helping to meet the requirement?

STF-25-17 Using the Attachment-1 filed responses to the 24th Set, please update with the 2nd Q 2026 information. Yes or no, does the marketer's gas operations staff continue internal training and proficiency with AGLC's EGMS system and bringing natural gas to Georgia?

STF-25-18 Using the Attachment-1 filed responses to the 24th Set, please update with the 2nd Q 2026 information. If the marketer has incurred any AGL penalties during the quarter, please list the type of penalty, dollar amount of the penalty, the month incurred, and when the funds were paid to AGL.

STF-25-19 Using the Attachment-1 filed responses to the 24th Set, please update with the 2nd Q 2026 information. Regarding the credit requirements of the major pipelines, please answer the following:

a. Does the marketer provide in-house natural gas operations? If not, please provide the name of the third-party vendor that provides natural gas operations on the marketer's behalf.

b. Does the marketer directly provide the credit requirement to the major pipelines?

c. Does the marketer's parent company provide the credit requirement to the major pipelines?

d. Does the marketer's third-party gas operations vendor provide the credit requirement to the major pipelines?

e. What is the current credit requirement of the major pipelines?

f. What method is used to meet the credit requirements of the major pipelines and what financial institution is helping to meet the requirement?

g. Does the marketer use a third party to meet the credit requirements, such as an asset manager?

h. If the marketer believes it does not have any credit requirements with the major pipelines, please explain how it can transport gas without posting credit.

STF-25-20 Using the Attachment-1 filed responses to the 24th Set, please update with the 2nd Q 2026 information. During the past quarter, and or currently, did the marketer have problems with any of its natural gas contracts?

STF-25-21 Using the Attachment-1 filed responses to the 24th Set, please update with the 2nd Q 2026 information. During the past quarter, and currently, did the marketer have problems with any of its storage contracts?

STF-25-22 Using the Attachment-1 filed responses to the 24th Set, please update with the 2nd Q 2026 information. Due to its continued technical performance and ongoing credit requirements, does the marketer have concerns about continuing operations in Georgia? Please explain.

Section-III: Other Items

STF-25-23 Using the Attachment-1 filed responses to the 24th Set, please update with the 2nd Q 2026 information. Does the marketer have any ongoing legal issues in Georgia and/or other states? If so, please explain.

STF-25-24 Using the Attachment-1 filed responses to the 24th Set, please update with the 2nd Q 2026 information. Regarding customer incentives, please answer the following:

a. Does the marketer offer any incentives to attract new customers?

b. Does the marketer work with any third parties to attract new customers?

c. Does the marketer work with any EMC's or municipal entities to attract new customers?

d. Does the marketer routinely offer discounts to Residential and Commercial/Industrial customers to attract those customers?

STF-25-25 Using the Attachment-1 filed responses to the 24th Set, please update with the 2nd Q 2026 information. Regarding mergers and acquisitions, please answer the following.

a. Currently, does the Georgia marketer, or its parent company, have any plans for acquiring customers in a State other than Georgia and serving customers in that State?

b. Currently, is the Georgia marketer, or its parent company, engaged in any discussions with other Georgia marketer(s) about acquiring their customers and/or business? If yes, please explain.

c. Currently, is the marketer, or its parent company, engaged in any discussions with an entity that is not a Georgia marketer about selling its customers to that entity? If yes, please explain.

d. Currently, is the marketer, or its parent company, engaged in any discussions with another Georgia marketer(s) about selling its customers and/or business to another Georgia marketer? If yes, please explain.

STF-25-26 Using the Attachment-1 filed responses to the 24th Set, please update with the 2nd Q 2026 information. Please provide a list of categories in the Georgia income statement and balance sheet that are based on allocated numbers.

STF-25-27 Using the Attachment-1 filed responses to the 24th Set, please update with the 2nd Q 2026 information. Regarding bad debt, please answer the following.

a. What is the marketer's current bad debt policy?

b. Has there been changes to bad debt policy in 2026 from 2025. If yes, please specify.

c. At what point does the marketer write off bad debt, 30 days, 60 days, 90 days after non-payment?

d. Does the marketer use the Direct Write Off Method or the Provision Method to account for bad debt?

e. How does the marketer engage in collections?

f. How is the marketer's allowance for bad debt calculated?

g. Based on a customer's credit score, when does the marketer charge a deposit?

h. Based on a customer's credit score, when does a marketer deny service?

i. During the 2nd Q 2026, what was the marketer's bad debt percentage? What was it for the 2nd Q 2025?

j. During the 2nd Q 2026, how many customer accounts were written off? During the 2nd Q 2025, how many customer accounts were written off?

k. During the 2nd Q 2026, how many customers entered into payment arrangements? During the 2nd Q 2025, how many customers entered into payment arrangements?

STF-25-28 Using the Attachment-1 filed responses to the 24th Set, please update with the 2nd Q 2026 information. Regarding O.C.G.A. 46-4-164(b), it states the following:

> **(b)** Notwithstanding any provision of law to the contrary, including, without limitation, Article 4 of Chapter 3 of this title, an electric membership corporation may make and maintain investments in, lend funds to, and guarantee the debts and obligations of an EMC gas affiliate in total not to exceed 15 percent of such electric membership corporation's net utility plant, excluding electric generation and transmission assets as defined by the Federal Energy Regulatory Commission Uniform System of Accounts in effect at the time of such investment, loan, or guarantee, provided that any such investments or loans shall not reflect rates which are generally available through the use of any tax exempt financing and

may not be tied to any loans from or guaranteed by the federal or state government; and an EMC gas affiliate of an electric membership corporation organized and operating pursuant to Article 4 of Chapter 3 of this title may apply for and be granted a certificate of authority to provide any service as authorized under this article. The creation, capitalization, or provision of management for:

(1) An EMC gas affiliate engaged in activities subject to the provisions of this article and the rules and regulations established by the commission; or

(2) Other persons providing customer services

shall be deemed to be among the purposes of an electric membership corporation as specified in paragraphs (2) and (3) of Code Section 46-3-200. Nothing in this article shall be deemed to increase or decrease the authority and jurisdiction of the commission with respect to such electric membership corporation except as to gas activities undertaken by the electric membership corporation or its EMC gas affiliate as authorized under this chapter.

Regarding any EMC parent company support, please complete Table below that provides the calculation percentage of EMC parent company support to the EMC gas affiliate.

EMC Assets

Total EMC Assets	
Minus Generating Assets	
Minus Transmission Assets	
Net EMC Assets	

EMC Support to Gas Affiliate

a. Equity Support	
b. Loan Support	
c. Credit Support	
d. Asset Support	
e. Other Support	
Total Support	

Percentage Support to Gas Affiliate	

Please contact Brian Artis if there are any concerns, bartis@psc.ga.gov or 404-656-3562.