FILED
09/02/2026
Executive Secretary G.P.S.C.

BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION

In Re:	**)**	
ATLANTA GAS LIGHT COMPANY'S INTEGRATED CAPACITY AND DELIVERY PLAN (i-CDP)	**)**	**DOCKET 43820**
	)	
	)	

STAFF'S TWENTY-FIFTH SET OF DATA REQUESTS TO ATLANTA GAS LIGHT COMPANY

TO: BLAKE O'FARROW
DIRECTOR – REGULATORY AFFAIRS
ATLANTA GAS LIGHT COMPANY
TEN PEACHTREE PLACE
ATLANTA, GA 30309

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 Atlanta Gas Light Company, ("AGL" or "Company") or its designated representatives. The Company shall file with the Executive Secretary's Office using the Alternative E-filing instructions. Public and Trade Secret responses shall be Accompanied therewith shall be an electronic version in Microsoft Word® format for text documents and Excel® for spreadsheets with unlocked and intact formulas.

Please provide responses on or before 4:00 p. m. on **October 2, 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
Docket No. 43820

Q1 2026 DOT Report

STF-25-1 Regarding STF-24-1, please answer the following:

a. In Worksheet-1, in the surcharge table, does AGL agree to add the information listed below to show which surcharge amounts were approved and which amounts were forecasted?

Worksheet-1

Collection Rates	Actual	Actual	Estimated	Estimated
Years	2025	2026	2027	2028
Residential, Multi-Family, AG-1 and S-51	0.13	0.57	0.79	1.09
General Delivery Service G-11	0.39	1.71	2.37	3.27
General Delivery Service - High Demand G-12	3.25	14.25	19.75	27.25

b. In Worksheet-4 and Worksheet-6, AGL calls the historical months "Actual", and the future months "Estimated", but Worksheet-5 is not consistent with Worksheet-4 and Worksheet-6. Does AGL agree to document all future months as "Estimated" and use bold font the entire row in Worksheet-5?

STF-25-2 Given that regulators, meters, and services have been included in DOT work since January 2025, why are these categories just now being incorporated into the DOT model?

STF-25-3 The ledger AGL filed with the 1st and 2nd Q 2026 Report was only for the current quarter. Related to Staff's item in STF-24-1 to STF-24-6, AGL indicated that a breakout of the items listed was not possible in the current ledger. As items are constructed, they are captured in the accounting system and can be placed in ledger form. However, the current ledger lacks detail for a breakdown and cost of materials. Please provide the following.

a. Please provide a 2nd Q 2026 ledger that includes a detailed breakout of materials and their costs, including type and size of pipe, meters, regulators, services, and other applicable components.

b. Please provide a rolling 2nd Q 2026 ledger with accumulated activity from January 2025 through June 2026 that can be isolated by month.

STF-25-4 What does AGL define as DOT work? Is this classification based on the size of the project, the project cost, or its proximity to a roadway? Has this definition changed since the 2020 rate case?

STF-25-5 Is AGL using the DOT rider to upgrade facilities and replace vintage pipe along roadways when the work is not associated with road widening or road replacement projects?

STF-25-6 When reviewing Attachment-24-2, there appears to be numerous small projects that are reflected in filed ledger. Please provide a list of contractors across the state who are performing DOT work found in the ledger.

STF-25-7 What is the total number of DOT projects completed between January 2025 and June 2026? What is the total associated cost?