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October 2, 2025

Via Alternative Electronic Filing

Sallie Tanner
Executive Secretary
Georgia Public Service Commission
244 Washington Street, SW
Atlanta, GA 30334

**Re: JOINT PETITION OF ATLANTA GAS LIGHT COMPANY, THE
CITY OF BUFORD, THE CITY OF LAWRENCEVILLE, AND THE
CITY OF SUGAR HILL FOR EXPEDITED APPROVAL OF THE
PROPOSED AMENDMENT TO THE GWINNETT COUNTYWIDE
SAFETY PLAN
Docket No. 30706 and 29330**

Dear Ms. Tanner:

Enclosed for filing please find the Joint Petition of Atlanta Gas Light Company, the City of Buford, the City of Lawrenceville, and the City of Sugar Hill for Expedited Approval of the Proposed Amendment to the Gwinnett Countywide Safety Plan. A hard copy of the enclosed filing will be provided to the Georgia Public Service Commission in compliance with the Alternative Electronic Filing Procedure. Thank you for your attention to this matter.

Sincerely yours,

Holland & Knight LLP



Lindsey S. Williamson

Enclosures

Atlanta | Austin | Boston | Century City | Charlotte | Chicago | Dallas | Denver | Fort Lauderdale | Houston | Jacksonville | Lakeland
Los Angeles | Miami | New York | Orlando | Portland | San Francisco | Stamford | Tallahassee | Tampa | Tysons
Washington, D.C. | West Palm Beach

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

In Re:)	
)	
Application of Atlanta Gas Light Company for Amended Certificate of Public Convenience and Necessity for Gwinnett County)	Docket No. 30706
)	
<i>In Re:</i>)	
)	
Gwinnett Countywide Safety Plan)	Docket No. 29330

**JOINT PETITION OF ATLANTA GAS LIGHT COMPANY, THE CITY OF BUFORD,
THE CITY OF LAWRENCEVILLE, AND THE CITY OF SUGAR HILL FOR
EXPEDITED APPROVAL OF PROPOSED
AMENDMENTS TO THE GWINNETT COUNTYWIDE SAFETY PLAN AND WAIVER
OF COMMISSION RULE 515-7-1-.15(6)**

Atlanta Gas Light Company (“AGL”), the City of Buford (“Buford”), the City of Lawrenceville (“Lawrenceville”), and the City of Sugar Hill (“Sugar Hill”) file this Joint Petition for Approval of the Proposed Amendments to the Gwinnett Countywide Safety Plan (“Joint Petition”) with the Georgia Public Service Commission (“Commission”), requesting that the Commission approve the proposed amendment to the Gwinnett Countywide Safety Plan (“Gwinnett CWSP”) under Commission Rule 515-9-7-.01(4) and waive Commission Rule 515-7-1-.15(6) (“Commission Rule 515-7-1-.15(6) or the “80 Foot Rule”).

INTRODUCTION

AGL - Lawrenceville

On February 17, 2016, the Commission approved the Gwinnett CWSP and AGL’s Application for an Amended Certificate of Public Convenience and Necessity. The Commission later approved amendments to the Gwinnett CWSP and AGL’s Certificate on December 18, 2018, July 2, 2020, and January 18, 2024. Since then, a residential customer at 4220 Smith Road, Loganville, Georgia, currently located along the safety-based boundary in AGL’s territory,

requested natural gas service. AGL and Lawrenceville have worked in good faith and determined that Lawrenceville will serve the new customer.

Under the proposed CWSP amendment, Lawrenceville will be serving one new customer in Gwinnett County, Georgia. There will be no customer transfers. Boundary 8 is proposed to be revised to expand Lawrenceville's service territory to include the one new customer at 4220 Smith Road, Loganville, Georgia. A copy of the proposed Gwinnett CWSP is attached hereto as Exhibit 1. Additionally, AGL, Buford, Lawrenceville, and Sugar Hill request that the Commission waive the hearing requirement set forth in Commission Rule 515-9-7-.01(4).

Sugar Hill - Buford

The Operators in Gwinnett County respectfully request a waiver of Commission Rule 515-7-1-.15(6) to allow the City of Buford to install a natural gas pipeline within its territory, which will be paralleling the City of Sugar Hill's natural gas main which is on the opposite side of the road along South Richland Creek Road and Sycamore Road for approximately 9,000 feet. Along this route, the centerline of South Richland Creek Road and Sycamore Road is the safety-based boundary where Buford's territory is the northeast side of the boundary. This extension is necessary to create a looped system and provide redundancy for serving the Republic Services Richland Creek Landfill, located within the City of Buford, as well as thousands of customers on the south end of Lake Lanier.

No customers will be affected by this installation, nor will any change in service provider occur. The project will eliminate the risk of single points of failure and enhance system capacity and operational efficiency.

The proposed installation will begin at 5409 South Richland Creek Road and terminate at 5960 Sycamore Road, as shown in Exhibit 2. For the purposes of the 80 Foot Waiver, the proposed project will parallel Sugar Hill's facilities.

CITATION TO AUTHORITY

The Commission has the authority to amend a Countywide Safety Plan ("CWSP") under Commission Rule 515-9-7-.01(4). Rule 515-9-7-.01(4) provides that "[a]fter adoption of a Natural Gas Safety Plan by the Commission, any Operator in the county may petition the Commission to amend, or the Commission may on its own motion initiate proceedings to amend, the Natural Gas Safety Plan." The Rule requires that the Operator(s) proposing to amend the CWSP "shall provide notice to every Operator with a natural gas Distribution System in the county of its proposed amendment and shall work in good faith with the existing Operator or Operators to file a jointly proposed amendment with the Commission." Ga. Comp. R. & Regs. 515-9-7-.01(4). AGL, Buford, Lawrenceville, and Sugar Hill have jointly worked together in good faith to propose this amendment to the Gwinnett CWSP. There are no other Operators in Gwinnett County.

Commission Utility Rule 515-7-1-.15(6) outlines the requirements for crossing or closures of one natural gas provider by another that come within eighty (80) feet of each other. Specifically, this rule provides that:

Except for good cause shown and upon credible testimony that such crossing or closure within eight (80) feet is safe and affords no significant danger to the public safety and welfare and after hearing before the Commission, no person shall construct or install any natural gas facilities that cross or are located within eighty (80) feet from any pipeline facility of another person. This prohibition shall apply in all instances, including where, as of the effective date of this rule, the distribution system or facilities operated by more than one person are in existence within a single certificated area or home county. A copy of the application for leave filed under this Subsection shall be served on the gas system operator whose system would be crossed or approached with[in] eighty (80) feet. In

instances in which the rights of parties will not be substantially prejudiced, the Commission maintains the discretion to waive the requirement for a hearing prior to granting an exception to the prohibition against crossing or closures within eighty (80) feet if the party seeking the exception and the party whose natural gas facility will be affected by the exception have both agreed to waive said hearing.

Ga. Comp. R. & Regs. R. 515-7-1-.15(6). The proposed project will provide for additional natural gas supply to serve existing and future Buford customers. The parallel facilities are safe and pose no danger to the public's safety and welfare. Therefore, good cause for the waiver of the 80 Foot Rule as defined herein exists.

Under Rule 515-7-1-.15(6), the Commission may waive the Rule's hearing requirement if all affected parties agree to such waiver. Since all affected Operators within Gwinnett County agree to the waiver of a hearing in order to avoid litigation and no other entities will be affected by an exception from the Rule, the Operators request that the Commission waive any hearing requirement.

CONCLUSION

Accordingly, AGL, Buford, Lawrenceville, and Sugar Hill respectfully request that the Commission grant this Joint Petition to amend Boundary 8 of the Gwinnett CWSP, grant the applicable waiver of the 80 Foot Rule, and waive the hearing requirement.

This 2nd day of October 2025.

HOLLAND & KNIGHT LLP
Counsel for Atlanta Gas Light Company



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By LSW with express permission
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**BEFORE THE PUBLIC SERVICE COMMISSION
STATE OF GEORGIA**

In Re:)	
)	
Application of Atlanta Gas Light Company for Amended Certificate of Public Convenience and Necessity for Gwinnett County)	Docket No. 30706
)	
In Re:)	
)	
Gwinnett Countywide Safety Plan)	Docket No. 29330

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the within and foregoing document upon the following persons via email or United States Mail as follows:

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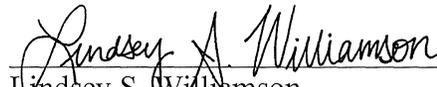
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Counsel for City of Buford

This 2nd day of October 2025.

HOLLAND & KNIGHT LLP

A handwritten signature in cursive script that reads "Lindsey S. Williamson". The signature is written in black ink and is positioned above a horizontal line.

Lindsey S. Williamson
Georgia Bar No. 783366

EXHIBIT 1

EXHIBIT 2

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

In Re:)
Gwinnett County-Wide Safety Plan) Docket No. 29330
)

JOINT CONSENT AGREEMENT

Come Now, the Facilities Protection Unit Staff (“Staff”) of the Georgia Public Service Commission (“Commission”), Atlanta Gas Light Company (“AGLC”), the City of Buford (“Buford”), the City of Lawrenceville (“Lawrenceville”), and the City of Sugar Hill (“Sugar Hill”) (collectively, “Applicants”); and hereby agree to presentation of the following proposed disposition of the above-styled matter:

FINDINGS AND CONCLUSIONS

1.

The Commission has jurisdiction over this matter pursuant to *inter alia*: O.C.G.A. §§ 46-2-20, 46-2-30, 46-2-53, 46-2-90, 46-2-91, 46-4-1, 46-4-31, 46-4-34, 46-4-35, 50-13-1 *et. seq.*; and Georgia Public Service Commission Rules 515-9-1-.01 *et. seq.*, 515-9-3-.01 *et. seq.* and 515-9-7-.01 *et. seq.*; all regarding the safe installation and operation of gas distribution systems within the State of Georgia.

2.

Commission Staff has safety jurisdiction over the facilities of municipal natural gas providers as delegated by the Commission pursuant to the legal citations contained *supra*.

3.

Applicants hereby waive any further conclusions of law with respect to the above-styled matter and agree that the Commission may enter an order based upon the agreements contained herein and the attached Amended County-Wide Safety Plan (“CWSP”) agreed to by the Applicants (and attached hereto as Attachment “A”), without the necessity of receiving evidence in support thereof.

AGREEMENT

By signing below, Applicants and Staff hereby agree that the above-styled matters should be resolved by executing this Joint Consent Agreement as follows:

1.

This Joint Consent Agreement, if approved by the Commission, shall constitute a final resolution of the Gwinnett CWSP proceedings. Applicants agree that they will abide by the terms of this Joint Consent Agreement.

2.

The CWSP for Gwinnett County (see attached, Attachment "A") agreed to by the Applicants and Staff, shall be the CWSP for Gwinnett County until otherwise ordered by the Commission.

3.

Compliance with all parts of the CWSP for Gwinnett County (*id.*) shall begin immediately upon issuance of the Commission Order adopting this CWSP. All timelines and action items contained within the Gwinnett CWSP shall be incorporated by reference into the body of this Consent Agreement as if specifically written herein and the failure of the Applicants to meet all such timelines and/or act on all such action items shall be a violation of this Consent Agreement.

4.

All changes to the CWSP for Gwinnett County (*id.*) shall be made in accordance with *inter alia*, Commission Rule 515-9-7-.01 *et seq.*

5.

This Joint Consent Agreement shall not become effective until and unless it is approved by the Commission. Applicants enter into this Joint Consent Agreement without admission of fault or liability.

6.

The undersigned authorized representatives of Atlanta Gas Light Company, the City of Buford, the City of Lawrenceville, and the City of Sugar Hill acknowledge by their respective signatures below that each has read this Joint Consent Agreement and understands its contents. The undersigned hereby further acknowledge that each Applicant has a right to a hearing in these matters and does freely, knowingly, and voluntarily waive such right by entering into this Joint Consent Agreement. The undersigned hereby consent on each Applicant's behalf to the resolution of the Gwinnett CWSP proceedings as provided for herein.

This ____ day of _____ 2026:

Consented to:

Walt Farrell, President
Authorized Representative of Atlanta Gas Light
Company

Honorable Phillip Beard, Board Chair
Authorized Representative of the City of Buford

Honorable David Still, Mayor
Authorized Representative of the City of Lawrenceville

Honorable Brandon Hembree, Mayor
Authorized Representative of the City of Sugar Hill

Michelle Thebert, Director, GPSC Facilities Protection
Unit, on behalf of Staff

Gwinnett County Countywide Safety Plan – Revision to Boundary 8 Comparison

Current Boundary 8 - Approved on February 17, 2016
Lavender – City of Lawrenceville Territory
Beige – AGL Territory



Proposed Boundary 8 – Revised boundary at 4220 Smith Road.
Lavender – City of Lawrenceville Territory
Beige – AGL Territory

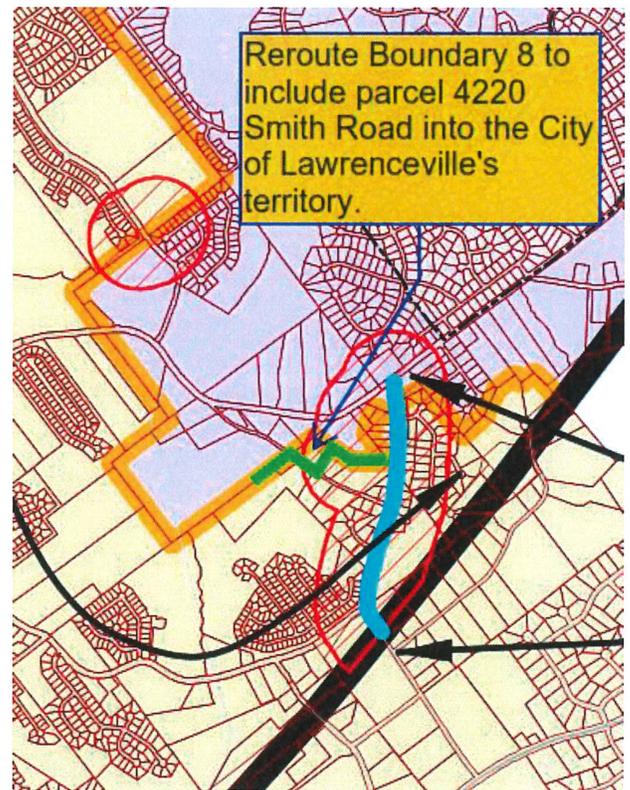


Exhibit 2

Gwinnett County CWSP – S Richland Creek Road and Sycamore Road - 80 ft Waiver Request

