

Sharla Dillon - Fwd: RE: Docket 07-00224

From: Kelly Grams
To: Dillon, Sharla
Date: 9/11/2008 9:58 AM
Subject: Fwd: RE: Docket 07-00224

Ms. Dillon,

Please file this email correspondence in Docket No. 07-00224. Thank you.

Kelly Grams
Hearing Officer

>>> Kelly Grams 9/11/2008 9:56 AM >>>
Counsel:

Thank you for your clarifications. Oral argument of this issue was concluded at the Status Conference on Tuesday. No further argument is necessary or requested. Should any issues, other than this particular matter arise, please let me know. I will do my best to have an Order issued today, however, due to other pending matters, it may be issued tomorrow. Thank you.

Kelly Cashman-Grams
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>>> "Jennifer L. Brundige" <jbrundige@farmerluna.com> 9/11/2008 9:28 AM >>>
Chattanooga Gas Company has explained repeatedly in its response to the CAPD's second discovery requests, in its response to the CAPD's motion to compel, and on the record at the September 9th status conference that the information that the CAPD has requested in Discovery Request Nos. 2 and 3 (i.e., the amount of natural gas placed into the LNG facility via each separate pipeline) cannot be supplied because the gas used for liquefaction into the LNG storage tank at the CGC peaking facility is not separately tracked by pipeline. At the status conference, we visually demonstrated why this is so. CGC is still planning to provide the additional information outlined in yesterday's email.

Jennifer

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From: Timothy Phillips [mailto:Timothy.Phillips@state.tn.us]
Sent: Wednesday, September 10, 2008 4:58 PM
To: Jennifer L. Brundige; Grams, Kelly
Cc: ChatterjeeBrown, Shilina; Collier, Ginger; J W. Luna; Phillips, Timothy
Subject: Re: Docket 07-00224

Dear Hearing Officer,

I would like to make it clear that the Consumer Advocate does not propose that supplying the information outlined below is the only way to answer the pertinent data requests. CGC has represented that the AGL family does not track the information sought. This does not mean that information does not exist which could lead to a better response to the request. The Consumer Advocate did not ask for what CGC tracks, but instead seeks to learn how much of the LNG storage comes from each separate pipeline. There may be several ways to get to the correct answer.

Thank you.

Timothy C. Phillips
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>>> Kelly Grams 9/10/2008 3:32 PM >>>
Dear Ms. Brundige:

Thank you for providing me with the update concerning certain questions related to the final round of discovery below. I will forward it for filing in the docket. Please continue to let me know of any other matters that arise.

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>>> "Jennifer L. Brundige" <jbrundige@farmerluna.com> 9/10/2008 2:53 PM >>>
Hearing Officer Cashman-Grams:

At yesterday's status conference, the Consumer Advocate continued to ask Chattanooga Gas Company to provide how much gas it put into the LNG facility separated by pipeline in response to Discovery Request Nos. 2 and 3. As demonstrated at yesterday's conference, the Company does not separately meter or track by pipeline the gas used for liquefaction into the LNG storage tank. While the Consumer Advocate did not ask for this information in its second discovery requests, the Consumer Advocate expressed an interest in knowing the volume of gas provided by pipeline to the LDC on a daily basis and the days when gas is injected into the LNG storage tank. Although this information is not responsive to written Discovery Request Nos. 2 and 3 as propounded by the Consumer Advocate, the Company will provide this information to the Consumer Advocate for the period of August 1, 2005 through July 31, 2008. It will take us a few days to pull this information together.

We will get back with you later this week about the Oct. 20th proposed hearing date.

Jennifer

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