

# FARMER & LUNA

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September 19, 2008

Kelly Cashman-Grams, Hearing Officer  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, Tennessee 37243-00505

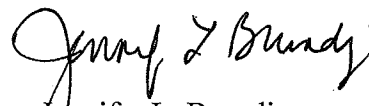
electronically filed 9/19/08

Re: Docket 07-00224

Dear Hearing Officer Cashman-Grams:

Enclosed please find Chattanooga Gas Company's ("CGC") supplemental response to Discovery Request No. 7(a) of the Consumer Advocate's Second Discovery Requests that is being produced in accordance with the September 12, 2008 Order Granting In Part and Denying In Part Consumer Advocate's Motion to Compel.

Sincerely yours,

  
Jennifer L. Brundige

Enclosure

cc: Timothy Phillips, Esq.  
TRA Docket Room  
Archie Hickerson

**CAPD Second Discovery Request No. 7(a):**

**QUESTION:**

- a. Provide all documents identifying the date and time when CGC decided that its contract 33653 with ETNG should be subdivided into new contracts 410203, 410,204 and 410,299.

**CGC SUPPLEMENTAL RESPONSE:**

The Company continues to rely upon its August 26, 2008 response to this request and is supplementing its response pursuant to the September 12, 2008 Order. Sequent Energy Management ("Sequent") does not have in its possession, custody, or control any data, documents, records, or other written information that is responsive to this discovery request.

Regarding the July 18, 2008 email attached to CGC's August 26, 2008 response to CAPD Second Discovery Request No. 9(b), Mr Freeman, an employee of CGC's asset manager Sequent, became aware of CGC's decision to turn back capacity and subdivide the contract through the normal course of business as CGC's asset manager.