

FARMER & LUNA

A PROFESSIONAL LIMITED LIABILITY COMPANY

ATTORNEYS AT LAW

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May 12, 2009

filed electronically in docket office 5/12/2009

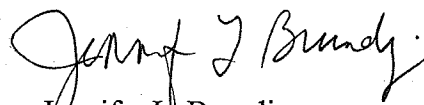
Timothy Phillips, Esq.
Mary L. White, Esq.
T. Jay Warner, Esq.
Consumer Advocate and Protection Division
Office of the Attorney General & Reporter
2nd Floor, 425 5th Avenue North
Nashville, TN 37243-0491

Re: Docket 07-00224

Dear Tim, Mary, and T. Jay:

Enclosed please find Chattanooga Gas Company's ("CGC") updated responses to certain discovery requests from the CAPD's First Set of Discovery Requests. Please note that the CD attachments for Nos. 17 and 24 and the paper attachment for Nos. 27 and 35 contain confidential information and are being filed under seal pursuant to the Agreed Protective Order entered on March 4, 2008 in this docket.

Sincerely yours,


Jennifer L. Brundige

Enclosures

cc: Kelly Cashman-Grams (responses w/o attachments)
TRA Docket Room
Shannon Pierce, Esq.

Question 1:

Please identify each person whom you expect to call as an expert witness at the hearing on the merits in this docket, and for each such expert:

- (a) Identify the field in which the witness is to be offered as an expert;

Response:

Each witness expected to present expert testimony in this matter on behalf of Chattanooga Gas Company, Inc. has as part of the submitted pre-filed testimony in this matter.

- (b) Provide complete background information, including the witness's current employer, as well as his or her educational, professional and employment history, and qualifications within the field in which the witness is expected to testify;

Response:

See pre-filed testimony and exhibits filed in this matter on July 30, 2008 and April 1, 2009.

- (c) Identify all publications written or presentations presented in whole or in part by the witness, including either a copy of all such publications and presentations or a reference to where such publications and presentations may be publicly obtained;

Response:

See pre-filed testimony and exhibits filed in this matter on July 30, 2008 and April 1, 2009, and see also Attachment 1(c) for the referenced materials that Mr. Sherwood still has in his possession. To the best of his knowledge, he is unaware whether other referenced materials can be obtained publicly.

- (d) Provide the grounds (including without limitation any factual bases) for the opinions to which the witness is expected to testify, and provide a summary of the grounds for each such opinion;

Response:

See pre-filed testimony and exhibits filed in this matter on July 30, 2008 and April 1, 2009.

- (e) Identify any matter in which the expert has testified (through deposition or otherwise) by specifying the name, docket number, and forum of each case, the dates of the prior testimony and the subject of the prior testimony, and identify the transcripts of any such testimony;

Response:

See pre-filed testimony and exhibits filed in this matter on July 30, 2008 and April 1, 2009. To the best of Mr. Sherwood's recollection, he has provided testimony in the following dockets or before the following authorities.

District of Columbia Public Service Commission – Docket 874 (Continuing Docket on Capacity Planning and Gas Supply) 2001, 2002, 2003, 2004

Georgia Public Service Commission - Docket No. 24960 (AGLC Capacity Supply Plan) 2007

Maryland Public Service Commission – Docket No. 8509 (Continuing Docket on Capacity Planning and Gas Supply) 1998, 1999, 2001, 2004

Maryland Public Service Commission – Docket No. 8951 (Capacity Planning Case) 2004

Maryland Public Service Commission – Docket No. 8981 (Third Party Transport Case) 2004

Tennessee Regulatory Authority – Docket No. 07-00224 (Chattanooga Gas Company's Gas Purchases and Related Sharing Incentives) 2007 - present

Tennessee Regulatory Authority – Docket No 08-00012 (Approval of Chattanooga Gas Company's Asset Management Agreement) 2008

Virginia State Corporation Commission – Docket No. PUE-2003-00131 (2003)

Virginia State Corporation Commission – Docket No. PUE-2003-00354 (2003)

Illinois Commerce Commission (while employed with Illinois Power Company) generally regarding gas supply matters

- (f) Identify the terms of the retention or engagement of each expert including but not limited to the terms of any retention or engagement letters or agreements relating to his/her engagement, testimony, and opinions as well as the compensation to be paid for the testimony and opinions;

Response:

Mr. Sherwood who has pre-filed testimony in this matter is an internal employee of the AGL Services Company.

- (g) Identify any exhibits to be used as a summary of or support for the testimony or opinions provided by the expert; and

Response:

See exhibits filed with the Company's pre-filed testimony on July 30, 2008 and April 1, 2009. The Company reserves the right to use any demonstrative exhibits and will provide them to the CAPD at the hearing prior to using them.

- (h) Please produce copies of all documents, summaries, charts, trade articles, journals, treatises, publications, workpapers, file notes, chart notes, tests, test results, interview notes, and consultation notes provided to, reviewed by, utilized by, relied upon, created by, or produced by and proposed expert witness in evaluating, reaching conclusions or formulating an opinion in this matter.

Response:

As agreed to by the parties, this request has been modified to require CGC to produce the documents “relied upon or produced by any witness” that are related to the testimony. CGC has modified this request accordingly.

To the best of its knowledge, the Company has already produced all such documents in its pre-filed testimony and exhibits filed on July 30, 2008 and April 1, 2009, and in its responses to the CAPD’s discovery requests. To the extent, CGC identifies additional documents or additional issues arise, CGC will supplement the appropriate filing or response prior to the hearing on the merits.

Gas Storage Valuation

Local Distribution Company Perspective

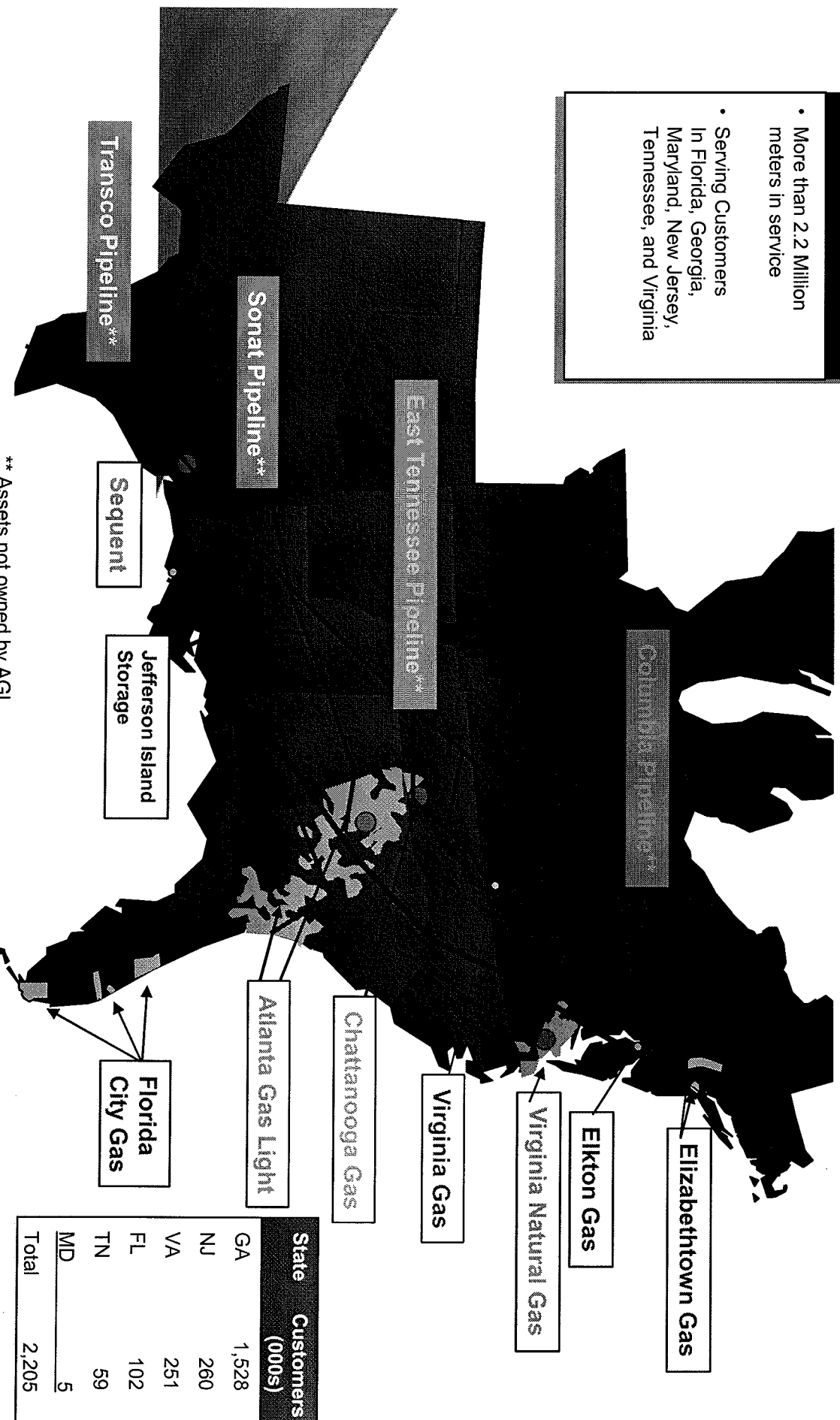
Tim Sherwood, Managing Director - Gas
Supply and Capacity Planning
AGL Resources



AGL Resources

AGL Resources Gas Operations

- More than 2.2 Million meters in service
- Serving Customers in Florida, Georgia, Maryland, New Jersey, Tennessee, and Virginia



** Assets not owned by AGL

Value of Storage in Utility Portfolios

- Storage as a portfolio shaping capacity resource to enhance transport efficiency
- Storage as a load balancing tool on a day ahead or intraday basis
- Storage as a commodity source during supply disruptions (well freeze off or hurricane)
- Storage as a gas cost management tool to capture seasonal cost advantages and avoid high Gas Daily purchases



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Storage as a Portfolio Shaping Capacity Resource

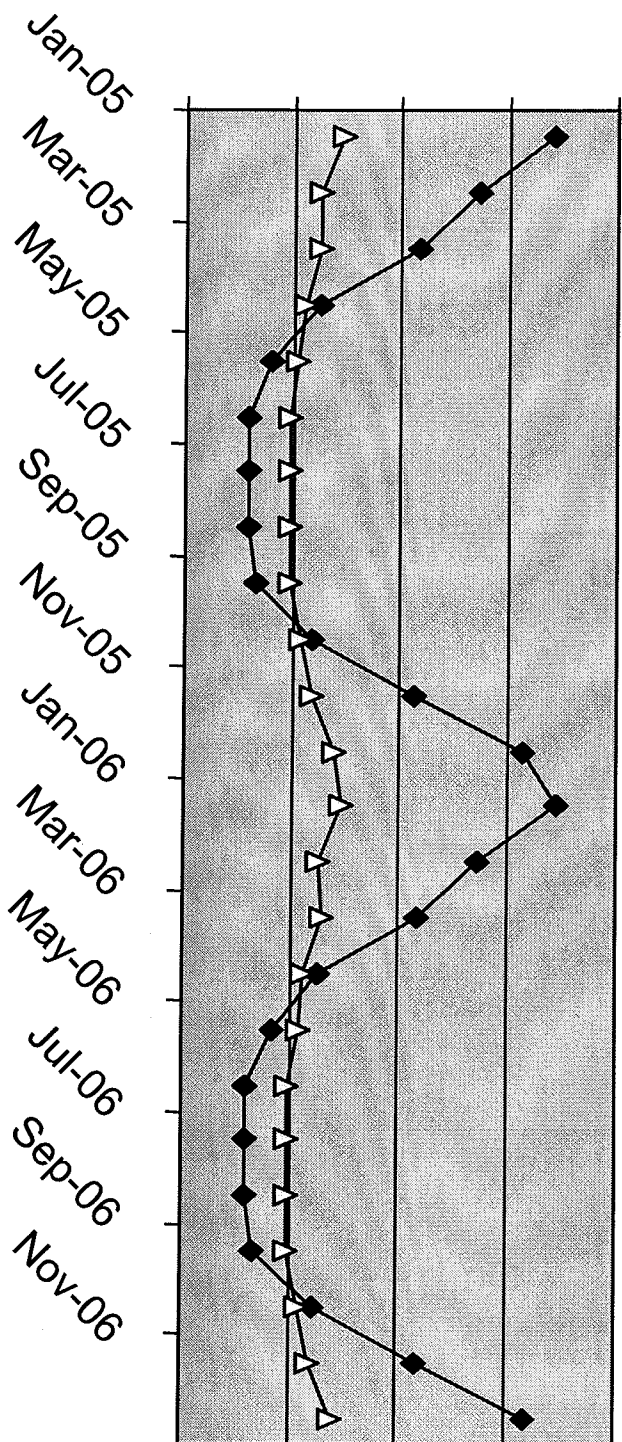
- Seasonal space heat usage typically results in significant winter versus summer load differential
- Firm Transportation can be used to fill storage in summer and serve load in winter, thus improving resource utilization
- Short haul storage transportation from market area storage may be lower cost than traditional long haul transport.



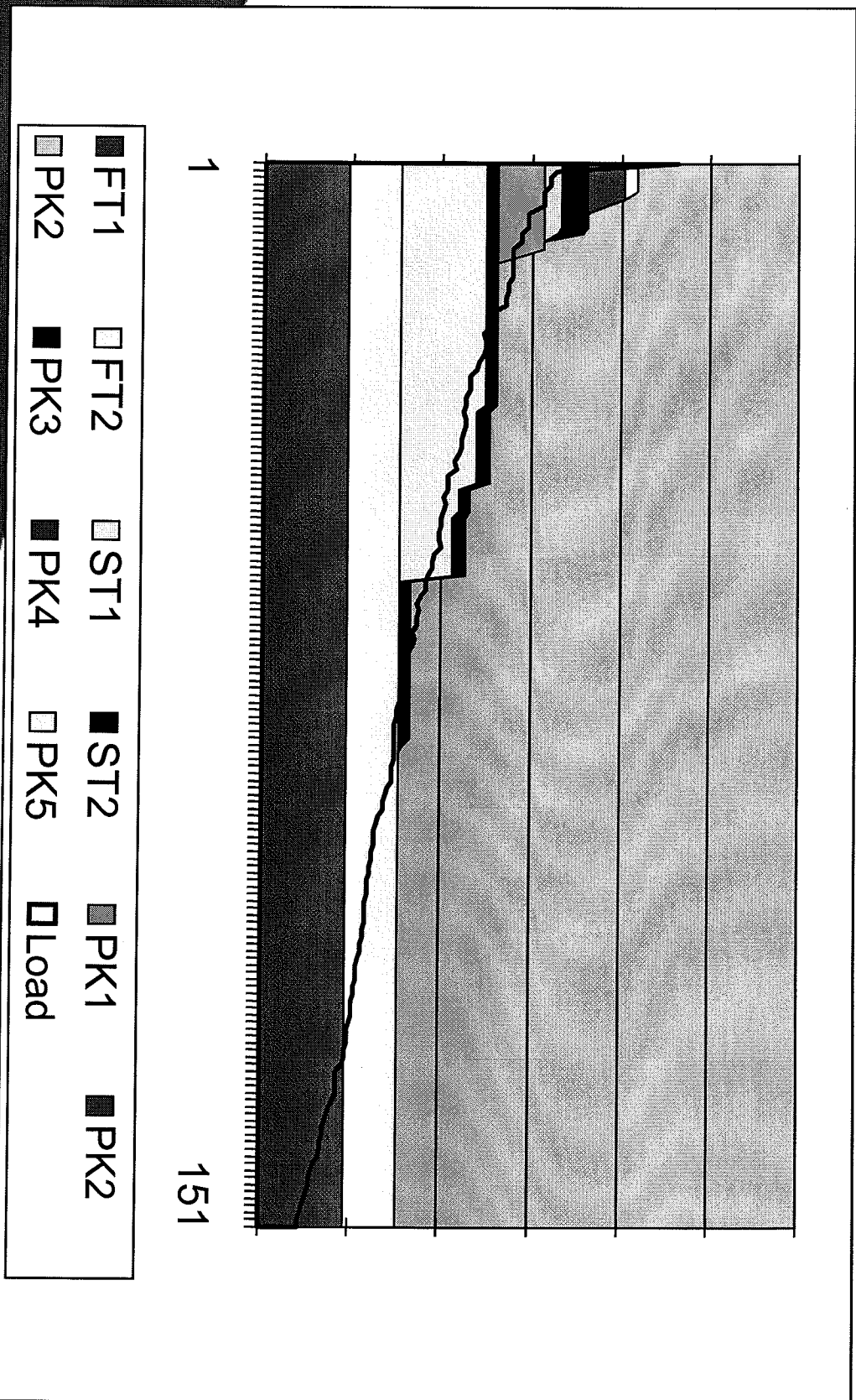
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Customer Mix and Weather Impacts on Seasonal Usage

Monthly Throughput



Storage and Load Duration



Limitations on Seasonal Storage Flexibility

- Seasonal based rights may limit winter injections or summer withdrawals
 - Injection right typically 50% of withdrawal rights
- Daily withdrawal rights dependent upon minimum physical inventory levels
 - Reduced withdrawal at 30% to 35% inventory level
- Many storage service tariffs establish maximum amount of gas that can be left in storage at the end of winter season



AGL Resources

Storage as a load balancing tool

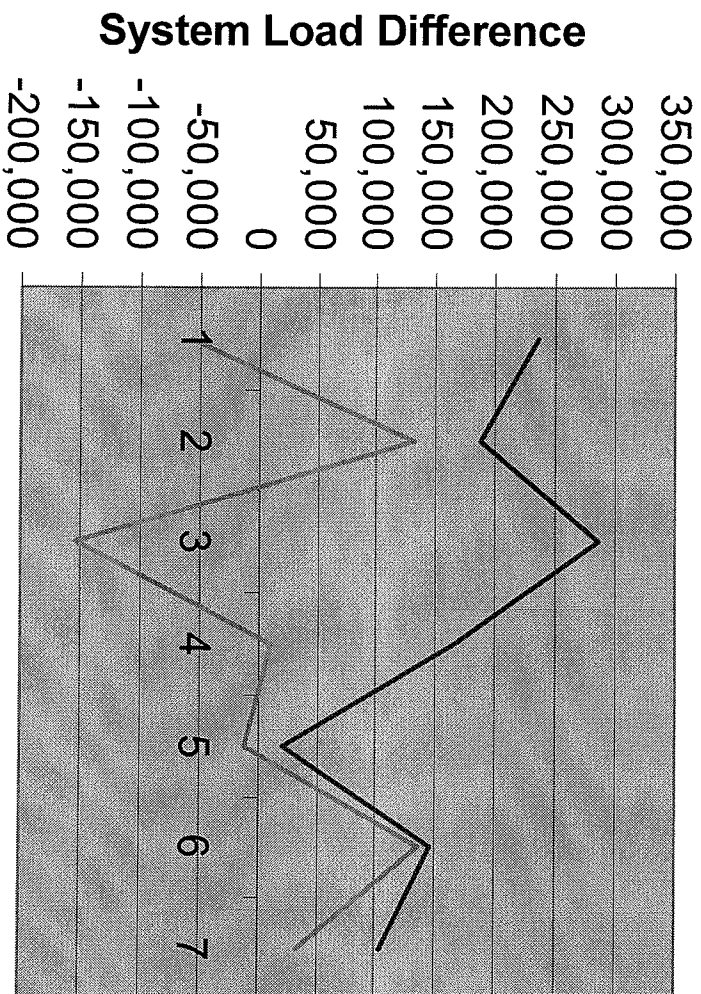
- In space heat saturated utilities load may change dramatically from day to day, due to temperature variation
- Weather forecast error can cause load to vary significantly from forecast during the day
- Some pipelines require gate station operator to be in balance each day through no notice storage activity
- Transportation customers are generally given tolerance levels which may be used for economic advantage



AGL Resources

Day to Day Load Change

Daily Load Change



— Day to Day Difference
— Daily Change

Weather Forecast Error

Day	Forecasted	Actual	Difference	Percentage
	HDD	HDD		
1	28	27	1	3.57%
2	23	24	1	4.35%
3	30	21	9	30.00%
4	26	23	3	11.54%
5	23	19	4	17.39%
6	27	24	3	11.11%
7	30	29	1	3.33%



AGL Resources

Limitations on Daily Storage Flexibility

- Some storage “held back” to manage swing requirements on daily balanced pipelines
- On most valuable days market area storage dispatched to meet load requirements
- Ratable payback of borrowed gas may not fit real need of utility
- Some customer transportation programs provide nomination deadlines and delivery flexibility to transporters that limits LDC’s ability to commit storage



AGL Resources

Storage to mitigate supply disruptions

- Given the tight balance between flowing supply and demand, loss of production impacts operational reliability
- Extreme cold in the production region can result in short duration “freeze offs” of flowing supply
- Tropical storms and hurricanes in the Gulf of Mexico can create prolonged production loss
- Damage to pipeline facilities can impact supply in some regions



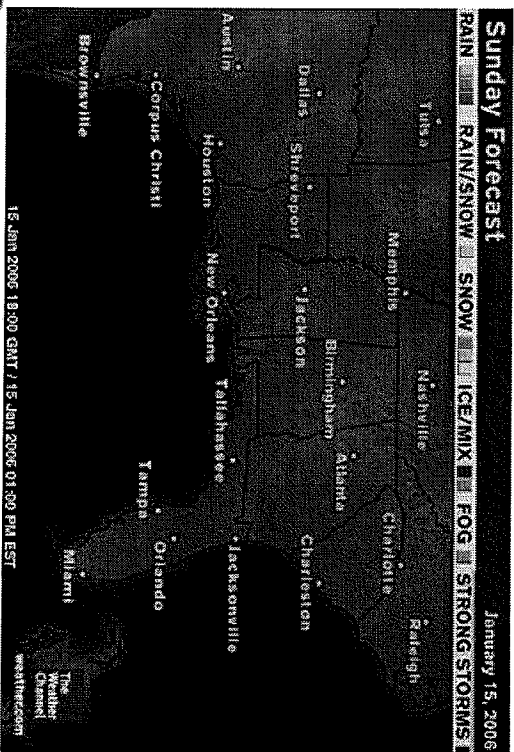
AGL Resources

Record Low Temperatures in Gulf Coast

There have been several extreme cold outbreaks in the natural gas production region of the United States.

Houston		New Orleans		Tallahassee
January 1979		January 1977		January 1984
1 st 25 F		17 th 25 F		21 st 21 F
2 nd 16 F		18 th 16 F		22 nd 24 F
3 rd 19 F		19 th 19 F		23 rd 28 F

Corpus Christi
January 1962
10 th 18 F
11 th 20 F
12 th 14 F

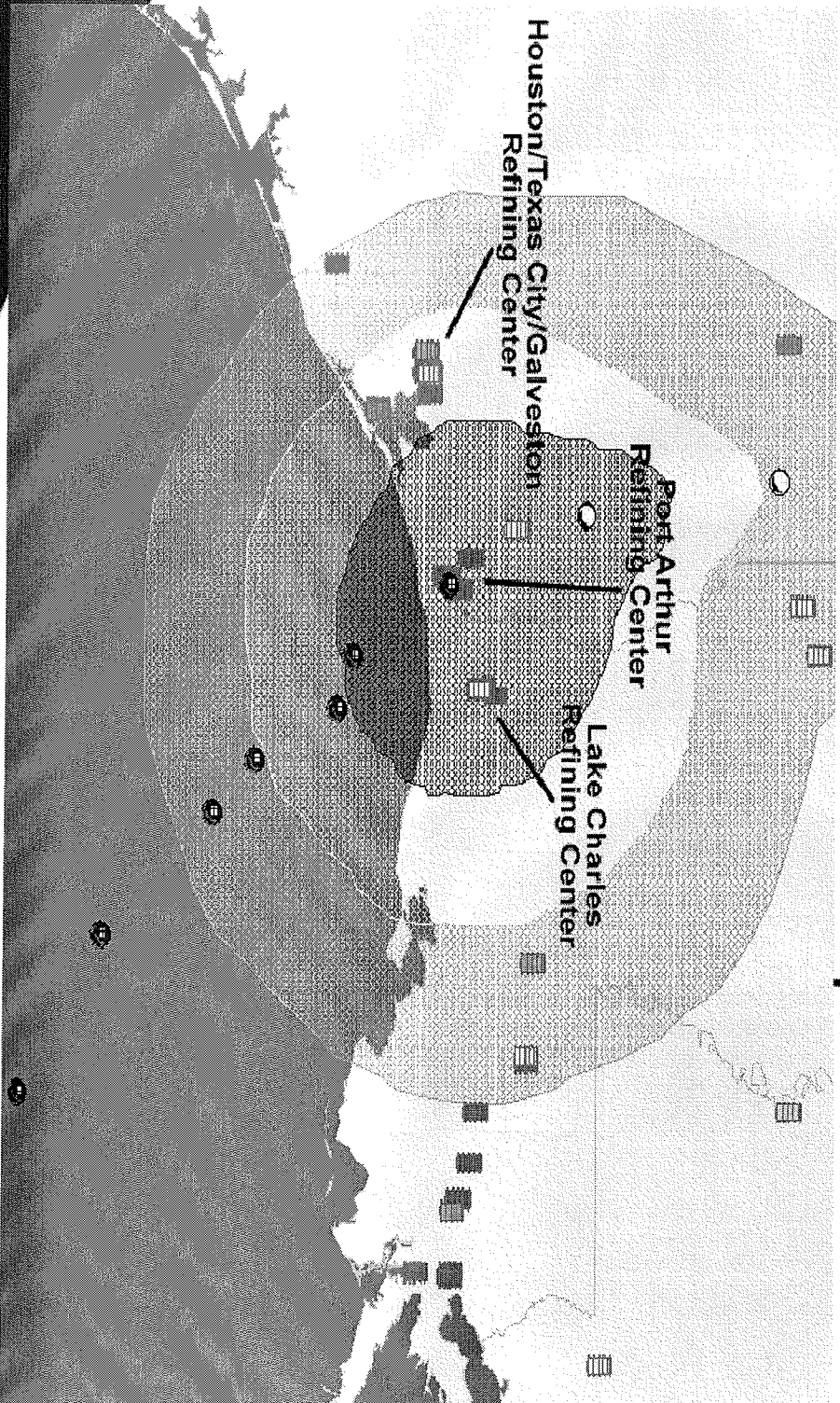


Tampa
January 1985
21 st 21 F
22 nd 25 F
23 rd 31 F

Source: Weather Channel

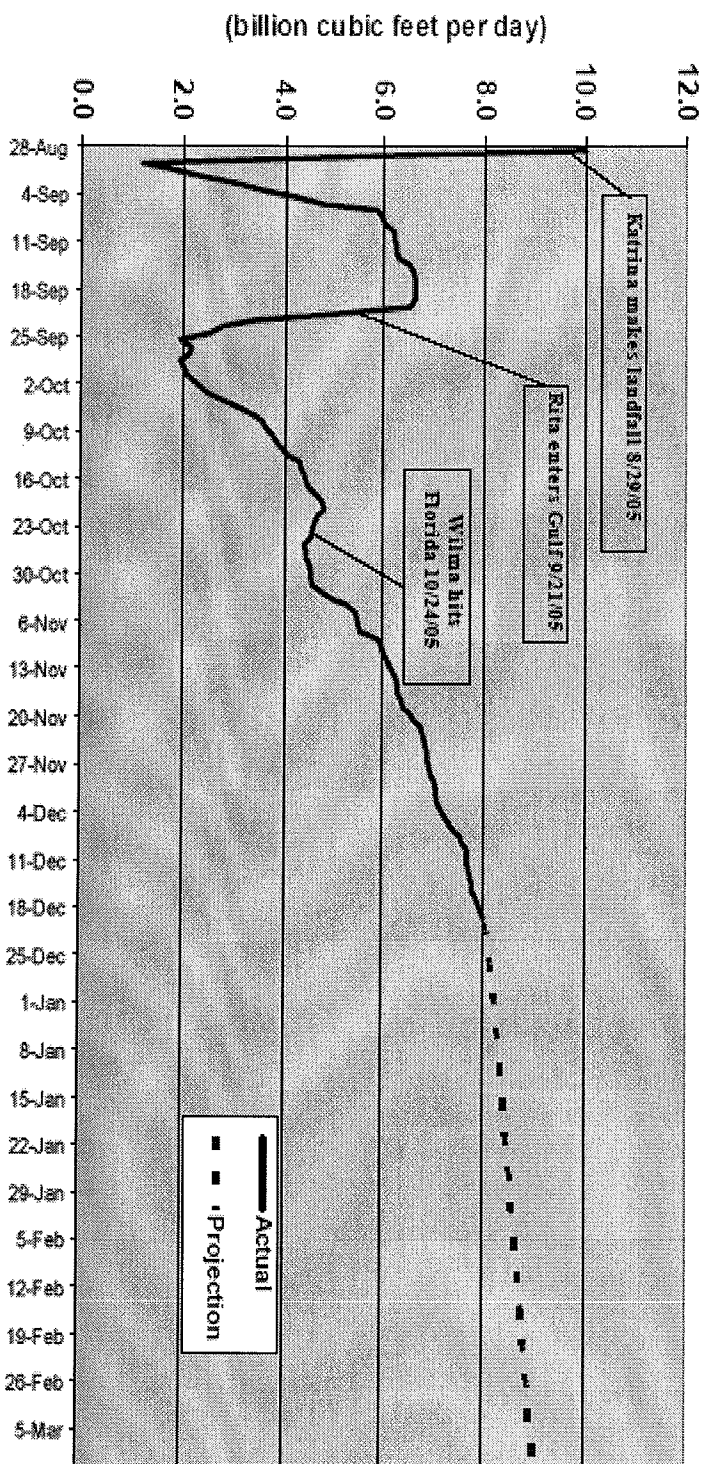
Gulf of Mexico Production Vulnerable to Tropical Weather

Hurricane Rita's Path at Landfall on September 24th



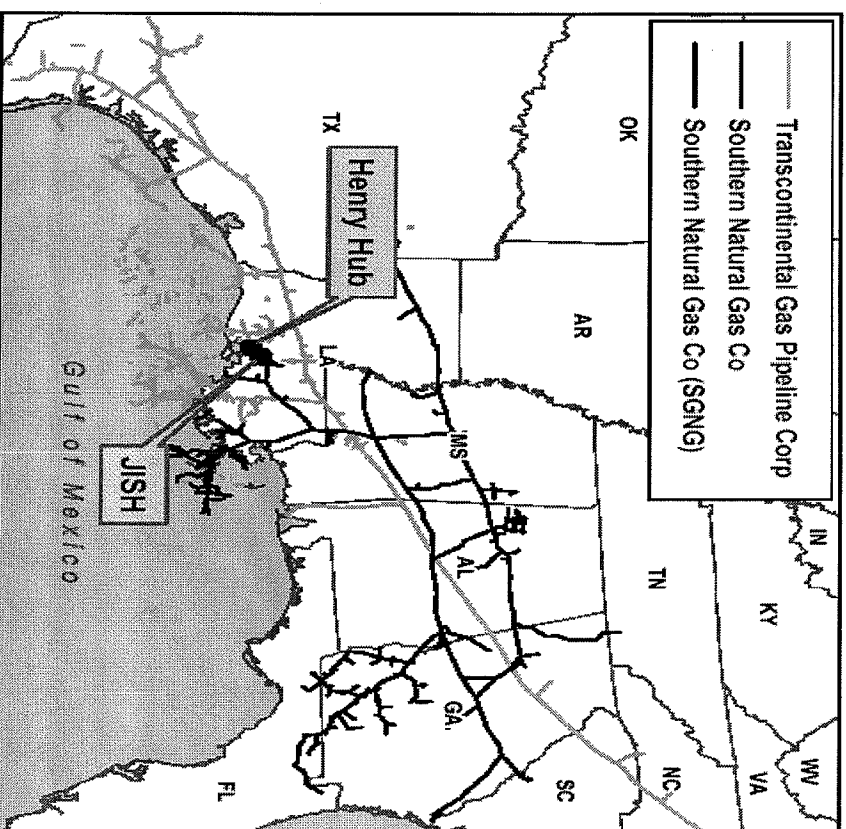
Tropical Weather Impact on GOM Production

Offshore GOM Natural Gas Recovery Profile



Production Area Salt Storage a Good Option

- Facilities handle dryer gas than wells or stripping plants and are designed to operate in severe cold
- High deliverability to inventory ratio allows significant supply replacement options for long or short term disruptions as well as balancing daily supply and demand
- Typically interconnected to several pipelines, which provides flexibility
 - Jefferson Island Storage Hub (JISH)
 - Connected to Columbia Gulf, Gulf South, LIG, NGPL, Sabine, Tennessee, and Transco



AGL Resources, Mapping Services, July 2004



AGL Resources

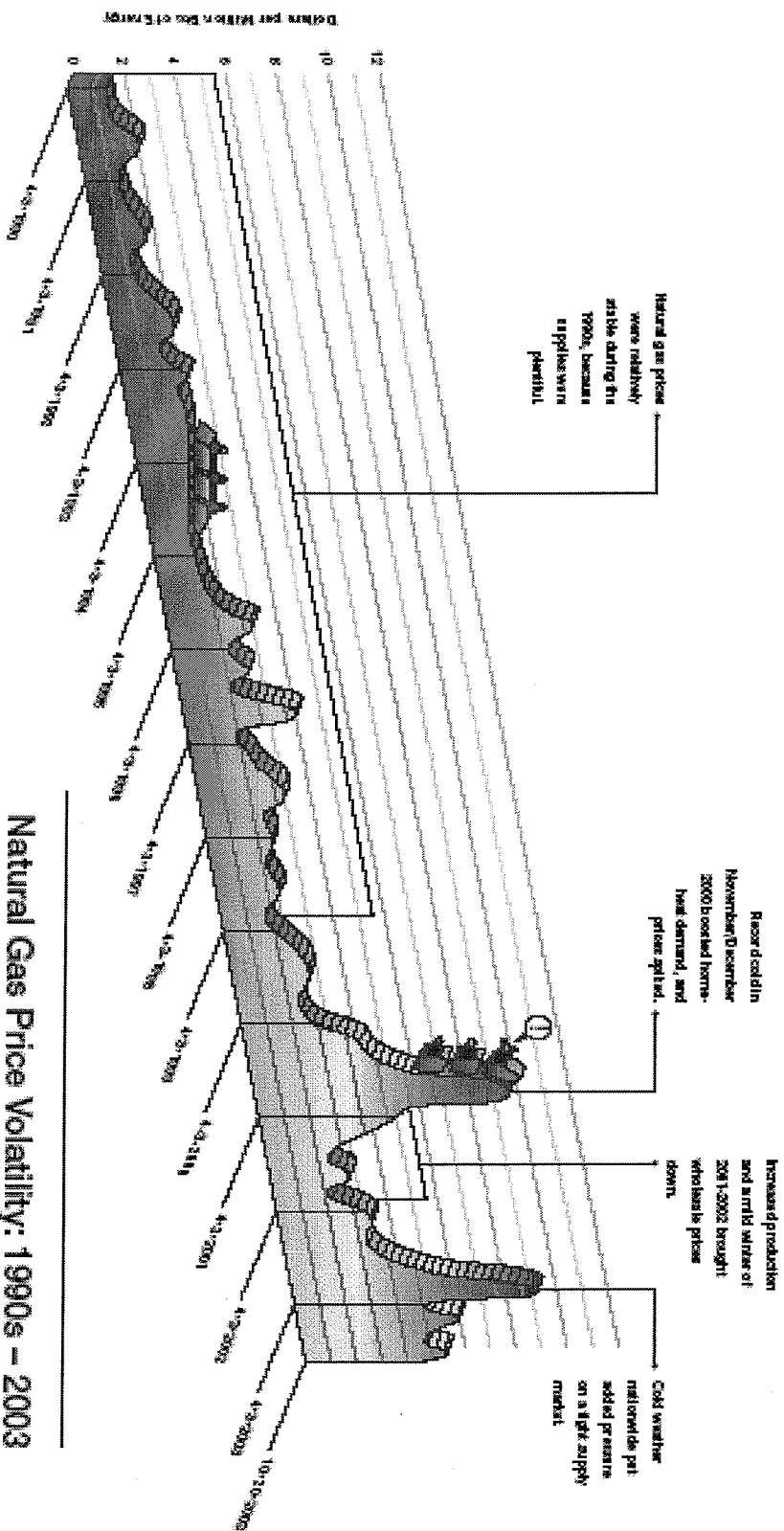
Storage as a Commodity Cost Management Tool

- Seasonal space heat usage typically provides opportunity to lock in a summer / winter price advantage
 - Seasonal, base load storage withdrawals can limit exposure to higher winter base load supplies
- Daily price swings are often compounded by demand increases driven by weather
 - Daily storage injection and withdrawal activity can capture downward swings and mitigate upward price spikes



AGL Resources

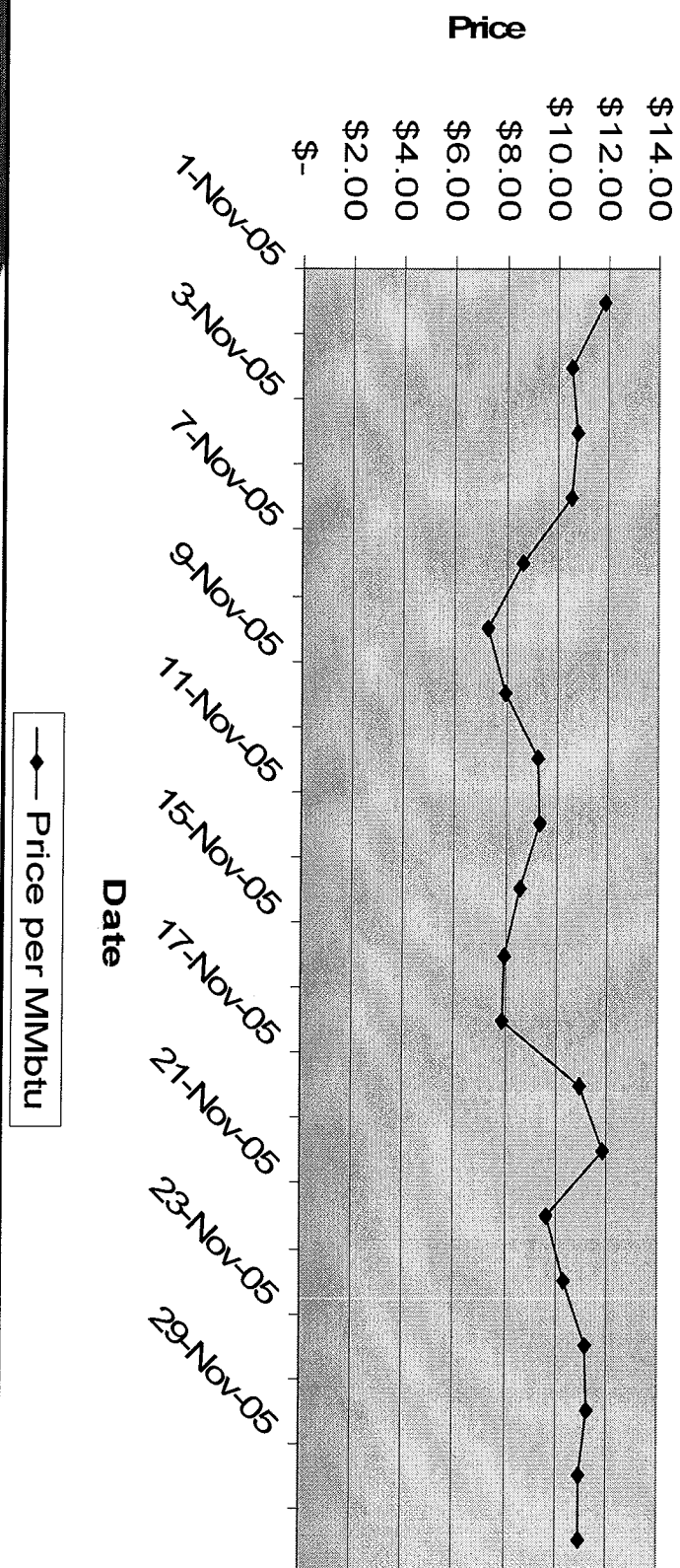
Price Volatility has increased in recent years



Source: AGA

Daily Price Swings Can Be Significant

Transco Station 65 Average Trading Price November 2005



Summary of Storage in Utility Portfolios

- Utilities are generally driven to lower the cost to customers
 - Storage can be used to shape portfolio and reduce fixed costs
 - Storage injections and withdrawals can be used to balance supply and demand
 - Storage coupled with firm transportation can mitigate impacts of supply disruptions
 - Storage inventory management can be used to reduce gas acquisition costs

Operational and tariff requirements may limit the ability to capture full economic potential



AGL Resources

Thank You

Tim Sherwood, AGL Resources
tsherwoo@aglresources.com



Question 2:

Please identify the name and location of all persons having knowledge of discoverable matters in this case.

Response:

In accordance with the parties' past practices for answering this question, see pre-filed testimony and exhibits filed in this matter on July 30, 2008 and April 1, 2009.

Question 3:

Please produce copies of all documents referred to or relied upon in responding to these discovery requests.

Response:

To the best of its knowledge, the Company has already produced all such documents in its pre-filed testimony and exhibits filed July 30, 2008 and April 1, 2009, and in its responses to these discovery requests. To the extent, CGC identifies additional documents that are responsive or additional issues arise, CGC will supplement the appropriate response prior to the hearing on the merits.

Question 4:

Please produce copies of all hearing exhibits that you plan to introduce, use, or reference at the hearing on the merits in this docket.

Response:

See exhibits filed with the Company's pre-filed testimony on July 30, 2008 and April 1, 2009. Additionally, the Company reserves the right to use, as an exhibit for cross examination or re-direct, any documents that have been produced in this matter. The Company reserves the right to use any demonstrative exhibit and will exchange any such exhibit with the CAPD at the hearing before its use.

Question 5:

Please produce copies of all documents – including, without limitation, workpapers, spreadsheets, summaries, charts, notes, exhibits, articles, journals, treatises, periodicals, publications, reports, records, statements, Internet web pages, or financial information – that you contend support the factual assertions, conclusions, or opinions of any of your witnesses in this matter and also all documents that contradict the factual assertions, conclusions, or opinions of any of your witnesses in this matter.

Response:

As agreed to by the parties and consistent with how the CAPD has responded to this same question in CGC's first set of discovery request propounded on the CAPD (see Discovery Request No. 5 (dated June 6, 2008)), this request has been modified to require production of documents "relied upon" by the witnesses as related to their testimony, and CGC responds accordingly.

To the best of its knowledge, the Company has already produced all such documents in its pre-filed testimony and exhibits filed on July 30, 2008 and April 1, 2009, and in its responses to the CAPD's discovery requests. To the extent, CGC identifies additional documents or additional issues arise, CGC will supplement the appropriate filing or response prior to the hearing on the merits.

Question 6:

Please produce copies of all documents – including, without limitation, workpapers, spreadsheets, summaries, charts, notes, exhibits, articles, journals, treatises, periodicals, publications, reports, records, statements, Internet web pages, or financial information – relied upon by any of your witnesses in evaluating, reaching conclusions, or formulating an opinion in this matter.

Response:

As agreed to by the parties and consistent with how the CAPD has responded to this same question in CGC's first set of discovery request propounded on the CAPD (see Discovery Request No. 6 (dated June 6, 2008)), this request has been modified to require production of documents "relied upon" by the witnesses as related to their testimony, and CGC responds accordingly.

To the best of its knowledge, the Company has already produced all such documents in its pre-filed testimony and exhibits filed on July 30, 2008 and April 1, 2009, and in its responses to the CAPD's discovery requests. To the extent, CGC identifies additional documents or additional issues arise, CGC will supplement the appropriate filing or response prior to the hearing on the merits.

Question 7:

Please produce copies of all documents – including, without limitation, workpapers, spreadsheets, summaries, charts, notes, and exhibits – created by or for or prepared by or for any of your witnesses in evaluating, reaching conclusions, or formulating an opinion in this matter.

Response:

As agreed to by the parties, this request has been modified to require CGC to produce the documents “relied upon or produced by any witness” that are related to the testimony in this matter.

To the best of its knowledge, the Company has already produced all such documents in its pre-filed testimony and exhibits filed on July 30, 2008 and April 1, 2009, and in its responses to the CAPD’s discovery requests. To the extent, CGC identifies additional documents or additional issues arise, CGC will supplement the appropriate filing or response prior to the hearing on the merits.

Question 8:

Identify all information, documents and things filed in the present docket records, including all responses to discovery of the parties and data request from the TRA Staff, which CGC produced in this docket and does not agree to stipulate to the authenticity of such information, documents and things in this proceeding. For each separate piece of information, documents, and things which CGC produced in this docket and CGC contends is not admissible as evidence describe in specific detail any objection(s) CGC claims as to admissibility into the evidentiary record in this docket.

Response:

CGC objects to this request because it seeks the mental impressions of CGC's attorneys regarding Tennessee Rules of Civil Procedure and Evidence. This request does not seek factual information from CGC that is designed to lead to the discovery of admissible evidence.

Question 9:

Please provide all Excel files (or other data files) containing the information provided in response to these requested items.

Response:

To the best of its knowledge, all data that has been maintained in Excel files and requested in such format has been provided in response to these discovery requests.

Question 17:

Please provide a complete copy of each ACA filing, including all supporting documentation and workpapers, submitted to the Tennessee Regulatory Authority during the last four fiscal years ended December 31, 2007.

Response:

See the attached.

The Company has also provided a copy of CGC's confidential ACA filing for years ended June 2004, June 2005, June 2006, and June 2007 in electronic format on CD. The CD is labeled Docket No. 07-00224 CAPD Data Request Question #17 Response.

CONFIDENTIAL – The attached information is provided under seal and is to be protected as required by the Agreed Protective Order dated March 4, 2008 in TRA Docket 07-00224.

CGC is supplementing this response by providing the attached paper copy of CGC's ACA filing for the 12 months ending June 30, 2008, and a copy of the CONFIDENTIAL supporting data in electronic format on CD. The CD is labeled Docket No. 07-00224 CAPD Data Request # 17 UPDATED CONFIDENTIAL Response, and is provided under seal subject to the Agreed Protective Order dated March 4, 2008 in TRA Docket 07-00224

Attachment 17

AGL Resources
 Atlanta Gas Light
 Chattanooga Gas
 Elizabethtown Gas
 Elkton Gas
 Florida City Gas
 Virginia Natural Gas
 AGL Networks
 Sequent Energy Management

800 477 5463 phone
 www.chattanoogagas.com
 2207 Olan Mills Drive
 Chattanooga TN 3742

2008 OCT 31 PM 3:30

T.R.A. DOCKET ROOM

October 30, 2008

Chairman Hargett
 Tennessee Regulatory Authority
 Attention Sharla Dillon
 460 James Robertson Parkway
 Nashville, TN 37243-0505

08-00206

Re: Chattanooga Gas Company Report of Transactions in the Deferred Gas Cost Account in compliance with Tennessee Regulatory Authority Administrative Rule 1220-4-7-.03(2).

Dear Chairman Hargett,

Attached is an original and thirteen copies of the Summary of the Transactions in Chattanooga Gas Company's Deferred Gas Cost Account for the twelve months ended June 30, 2008 and the computation of ACA factor effective December 1, 2008 (Attachment A) as required by Tennessee Regulatory Authority Administrative Rule 1220-4-7-.03(2).

The resulting ACA factors are:

Rate Schedule	ACA Commodity Factor
R-1/R-4	\$0.0149/Therm
C-1	\$0.0149/Therm
A/C	(\$0.0321/Therm)
I-1	(\$0.3212/Dth)

Services with two part (Demand and Commodity Rates

	ACA Demand Factor	ACA Commodity Factor
C-2	\$1.6908/Dth	(\$0.3212/Dth)
F-1	\$1.6908/Dth	(\$0.3212/Dth)
T-2/T-3	\$1.6908/Dth	



Chattanooga Gas

Copies of the underlying accounting documents needed for the audit are being provided the Staff.

Also enclosed are an original and thirteen copies of Chattanooga Gas Company Tariff No. 1 Eighty -Fourth Revised Sheet No. 55.

If you or the TRA Staff have any questions please call me at 757 616 7510.

Sincerely,

A handwritten signature in cursive script, appearing to read "Archie R. Hickerson".

Archie R. Hickerson
Director-Regulatory Affairs

C: Ms. Amanda Hwang
Mrs. Pat Murphy

CHATTANOOGA GAS COMPANY
MONTHLY DEFERRED GAS COST
JULY 1, 2007 THRU JUNE 30, 2008

REG. BALANCE-COMMODITY	JULY 07	AUG	SEPT	OCT	NOV	DEC	JAN 08	FEB	MARCH	APRIL	MAY	JUNE
COST OF GAS PURCHASED - COMMODITY	13,466,614.68	(3,810,444.46)	(4,323,207.68)	(4,873,967.61)	(5,189,726.10)	(6,104,323.28)	(6,431,613.30)	(6,519,743.87)	(6,452,741.46)	(5,976,188.80)	(4,765,948.82)	(3,881,788.12)
Spot Market & Transportation	3,559,317.24	3,000,093.77	2,700,316.39	3,602,361.56	4,320,625.25	4,128,088.79	5,885,543.05	5,619,849.64	5,335,866.75	9,776,423.02	10,280,021.07	14,945,962.47
Other Suppliers - End Users	37,041.20	(2,622.97)	(37,461.02)	(22,740.87)	(22,253.54)	88,315.71	(289,984.41)	3,358.35	(6,740.21)	(67,876.07)	(67,876.07)	45,084.34
Supplier Refund	291,518.33	103,423.08	719,871.39	733,956.97	1,526,891.84	3,607,693.68	5,325,681.99	5,183,765.43	3,573,295.50	105,392.82	726,401.71	1,316,605.47
Storage Withdrawals	238,732.41	189,447.28	175,407.54	142,030.00	144,184.84	143,982.80	166,312.55	151,875.50	206,689.74	191,024.39	214,864.88	361,381.06
LNG Balloon												
LNG Inventory Adjustment												
Consulting Fees												
Taxes												
TOTAL	4,124,610.18	3,855,627.21	3,633,266.34	4,424,432.32	5,698,426.39	7,977,190.95	14,250,231.13	11,181,154.27	9,76,785.25	10,006,040.02	11,157,651.59	16,588,593.27
Storage Injections	(2,508,558.47)	(2,186,855.10)	(2,265,009.50)	(2,416,125.55)	(3,330,440)	(473,400.77)	(37,319.79)	(49,397.12)	(60,350.65)	(3,334,353.68)	(5,285,433.08)	(7,435,285.15)
Other Suppliers - End Users	(323,229.54)											
LNG Liquidation & Fuel	1,892,122.17	1,159,692.11	1,365,040.84	2,007,369.27	5,884,132.45	7,503,790.21	14,215,113.34	11,119,707.15	9,129,355.00	9,659,089.33	4,747,653.16	4,028,574.86
TOTAL PURCHASED	1,892,122.17	1,159,692.11	1,365,040.84	2,007,369.27	5,884,132.45	7,503,790.21	14,215,113.34	11,119,707.15	9,129,355.00	9,659,089.33	4,747,653.16	4,028,574.86
COST OF GAS RECOVERED - COMMODITY												
Actual Billings	1,897,708.00	1,722,920.00	1,832,472.00	1,939,513.00	2,840,139.22	7,405,588.48	10,767,968.48	13,206,372.65	11,094,571.38	7,889,981.23	5,205,352.00	4,615,420.05
Current Month Unbilled	828,978.00	1,006,717.00	886,101.00	1,877,311.00	3,845,182.00	5,405,182.00	8,417,051.00	7,111,472.00	5,343,920.00	4,169,845.00	3,206,338.00	2,359,417.00
Prior Month Unbilled	(920,116.00)	(920,978.00)	(1,006,717.00)	(886,101.00)	(1,877,311.00)	(3,845,182.00)	(5,405,182.00)	(7,111,472.00)	(5,343,920.00)	(4,169,845.00)	(3,206,338.00)	(2,359,417.00)
ACA Refund	(78,124.00)	(74,176.00)	(77,875.00)	(68,730.00)	(184,097.72)	(341,765.35)	(513,101.94)	(648,843.18)	(546,724.00)	(384,085.18)	(225,215.85)	(188,958.82)
2007 -												
ACA Surcharges												
Company Use Gas Consumption	13.15	14.16	7.08	26.63	26.03	218.22	280.28	788.73	241.24	250.87	124.85	34.65
TOTAL RECOVERY	1,798,461.15	1,725,405.18	1,633,948.03	2,444,018.63	5,693,138.13	9,604,819.33	13,046,097.43	11,260,085.20	9,780,637.62	8,359,181.81	4,922,664.30	3,576,877.85
SS-1 (Nonpayment Margin Loss)	28,648.07	13,338.61	22,824.54	18,449.81	18,449.81	18,449.81	18,449.81	20,421.32	31,116.04	32,484.18	36,009.46	33,070.17
WMA Underrecovery/Overrecovery	53,981.48	83,027.24	50,877.28	21,551.53	(8,546.20)	(4,461.83)	1,190.14	22,690.85	11,184.13	25,488.88	38,557.68	68,300.25
Uncollected Gas Costs												
MONTHLY ACTIVITY - COMMODITY												
ENDING BALANCE	(392,411.45)	(480,347.20)	(615,258.35)	(802,277.09)	(1,200,698.51)	(1,287,183.51)	(1,162,454.33)	(81,685.88)	388,118.75	320,685.28	268,245.40	1,389,077.41
AVERAGE ENDING BALANCE	(5,747,591.53)	(4,300,204.46)	(4,453,833.04)	(4,470,115.55)	(5,140,676.05)	(5,337,222.00)	(5,275,158.87)	(5,338,644.55)	(5,045,328.50)	(4,729,281.50)	(3,857,211.12)	(2,812,711.71)
INTEREST	(24,418.00)	(27,913.00)	(30,418.00)	(33,422.00)	(36,426.00)	(39,430.00)	(42,434.00)	(45,438.00)	(48,442.00)	(51,446.00)	(54,450.00)	(57,454.00)
COMMODITY BALANCE	(416,829.45)	(508,260.20)	(645,676.35)	(835,699.09)	(1,237,124.51)	(1,326,613.51)	(1,184,888.33)	(123,100.88)	336,536.75	269,239.28	213,795.40	1,446,531.81
BEGINNING BALANCE - DEMAND	389,398.41	841,186.11	1,308,129.81	1,876,015.61	2,897,828.43	2,781,112.30	2,641,355.66	1,891,278.71	1,491,382.22	1,424,088.82	1,742,081.00	2,388,846.28
COST OF GAS PURCHASED - DEMAND												
Pipeline Demand	926,646.33	926,646.33	926,646.33	926,646.33	926,646.33	926,646.33	926,646.33	926,646.33	926,646.33	926,646.33	926,646.33	926,646.33
Company Use	926,646.33	926,646.33	926,646.33	926,646.33	926,646.33	926,646.33	926,646.33	926,646.33	926,646.33	926,646.33	926,646.33	926,646.33
TOTAL	926,646.33	926,646.33	926,646.33	926,646.33	926,646.33	926,646.33	926,646.33	926,646.33	926,646.33	926,646.33	926,646.33	926,646.33
COST OF GAS RECOVERED - DEMAND												
Actual Billings	437,381.63	404,486.63	427,882.63	421,834.28	629,652.28	987,382.45	1,272,553.79	1,395,055.98	1,130,430.51	735,165.36	530,650.49	433,922.22
Current Month Unbilled	578,701.00	630,216.00	551,889.00	235,031.00	442,720.00	988,722.00	846,638.00	720,712.00	539,381.00	398,029.00	278,395.00	212,151.00
Prior Month Unbilled	(571,450.00)	(574,701.00)	(623,216.00)	(623,216.00)	(235,031.00)	(442,720.00)	(846,638.00)	(720,712.00)	(539,381.00)	(398,029.00)	(278,395.00)	(212,151.00)
2007 -	14,293.00	14,155.00	14,007.00	14,623.00	14,819.20	65,524.65	81,322.38	67,949.84	54,244.22	33,719.71	22,116.84	18,475.14
ACA Surcharges												
TOTAL RECOVERY	451,774.63	418,697.63	441,891.63	436,865.28	644,371.48	1,033,104.45	1,313,886.17	1,462,015.96	1,184,816.23	833,184.67	558,045.93	436,097.36
MONTHLY ACTIVITY - DEMAND												
ENDING BALANCE	(578,701.00)	(630,216.00)	(551,889.00)	(235,031.00)	(442,720.00)	(988,722.00)	(846,638.00)	(720,712.00)	(539,381.00)	(398,029.00)	(278,395.00)	(212,151.00)
AVERAGE ENDING BALANCE	(630,223.76)	(630,223.76)	(630,223.76)	(630,223.76)	(630,223.76)	(630,223.76)	(630,223.76)	(630,223.76)	(630,223.76)	(630,223.76)	(630,223.76)	(630,223.76)
INTEREST	(24,418.00)	(27,913.00)	(30,418.00)	(33,422.00)	(36,426.00)	(39,430.00)	(42,434.00)	(45,438.00)	(48,442.00)	(51,446.00)	(54,450.00)	(57,454.00)
COMMODITY BALANCE	(603,119.00)	(658,129.00)	(582,307.00)	(269,054.00)	(487,540.00)	(1,077,242.00)	(933,272.00)	(806,154.00)	(677,723.00)	(536,435.00)	(402,845.00)	(269,605.00)
BEGINNING BALANCE - DEMAND	(578,701.00)	(630,216.00)	(551,889.00)	(235,031.00)	(442,720.00)	(988,722.00)	(846,638.00)	(720,712.00)	(539,381.00)	(398,029.00)	(278,395.00)	(212,151.00)
MONTHLY ACTIVITY - DEMAND												
ENDING BALANCE	(578,701.00)	(630,216.00)	(551,889.00)	(235,031.00)	(442,720.00)	(988,722.00)	(846,638.00)	(720,712.00)	(539,381.00)	(398,029.00)	(278,395.00)	(212,151.00)
AVERAGE ENDING BALANCE	(630,223.76)	(630,223.76)	(630,223.76)	(630,223.76)	(630,223.76)	(630,223.76)	(630,223.76)	(630,223.76)	(630,223.76)	(630,223.76)	(630,223.76)	(630,223.76)
INTEREST	(24,418.00)	(27,913.00)	(30,418.00)	(33,422.00)	(36,426.00)	(39,430.00)	(42,434.00)	(45,438.00)	(48,442.00)	(51,446.00)	(54,450.00)	(57,454.00)
COMMODITY BALANCE	(603,119.00)	(658,129.00)	(582,307.00)	(269,054.00)	(487,540.00)	(1,077,242.00)	(933,272.00)	(806,154.00)	(677,723.00)	(536,435.00)	(402,845.00)	(269,605.00)
BEGINNING BALANCE - DEMAND	(578,701.00)	(630,216.00)	(551,889.00)	(235,031.00)	(442,720.00)	(988,722.00)	(846,638.00)	(720,712.00)	(539,381.00)	(398,029.00)	(278,395.00)	(212,151.00)
MONTHLY ACTIVITY - DEMAND												
ENDING BALANCE	(578,701.00)	(630,216.00)	(551,889.00)	(235,031.00)	(442,720.00)	(988,722.00)	(846,638.00)	(720,712.00)	(539,381.00)	(398,029.00)	(278,395.00)	(212,151.00)
AVERAGE ENDING BALANCE	(630,223.76)	(630,223.76)	(630,223.76)	(630,223.76)	(630,223.76)	(630,223.76)	(630,223.76)	(630,223.76)	(630,223.76)	(630,223.76)	(630,223.76)	(630,223.76)
INTEREST	(24,418.00)	(27,913.00)	(30,418.00)	(33,422.00)	(36,426.00)	(39,430.00)	(42,434.00)	(45,438.00)	(48,442.00)	(51,446.00)	(54,450.00)	(57,454.00)
COMMODITY BALANCE	(603,119.00)	(658,129.00)	(582,307.00)	(269,054.00)	(487,540.00)	(1,077,242.00)	(933,272.00)	(806,154.00)	(677,723.00)	(536,435.00)	(402,845.00)	(269,605.00)
BEGINNING BALANCE - DEMAND	(578,701.00)	(630,216.00)	(551,889.00)	(235,031.00)	(442,720.00)	(988,722.00)	(846,638.00)	(720,712.00)	(539,381.00)	(398,029.00)	(278,395.00)	(212,151.00)
MONTHLY ACTIVITY - DEMAND												
ENDING BALANCE	(578,701.00)	(630,216.00)	(551,889.00)	(235,031.00)	(442,720.00)	(988,722.00)	(846,638.00)	(720,712.00)	(539,381.00)	(398,029.00)	(278,395.00)	(212,151.00)
AVERAGE ENDING BALANCE	(630,223.76)	(630,223.76)	(630,223.76)	(630,223.76)	(630,223.76)	(630,223.76)	(630,223.76)	(630,223.76)	(630,223.76)	(630,223.76)	(630,223.76)	(630,223.76)
INTEREST	(24,418.00)	(27,913.00)	(30,418.00)	(33,422.00)	(36,426.00)	(39,430.00)	(42,434.00)	(45,438.00)	(48,442.00)	(51,446.00)	(54,450.00)	(57,454.00)
COMMODITY BALANCE	(603,119.00)	(658,129.00)	(582,307.00)	(269,054.00)	(487,540.00)	(1,077,242.00)	(933,272.00)	(806,154.00)	(677,723.00)	(536,435.00)	(402,845.00)	(269,605.00)
BEGINNING BALANCE - DEMAND	(578,701.00)	(630,216.00)	(551,889.00)	(235,031.00)	(442,720.00)	(988,722.00)	(846,638.00)	(720,712.00)	(539,381.00)	(398,029.00)	(278,395.00)	(212,151.00)
MONTHLY ACTIVITY - DEMAND												
ENDING BALANCE	(578,701.00)	(630,216.00)	(551,889.00)	(235,031.00)	(442,720.00)	(988,722.00)	(846,638.00)	(720,712.00)	(539,381.00)	(398,029.00)	(278,395.00)	(212,151.00)
AVERAGE ENDING BALANCE	(630,223.76)	(630,223.76)	(630,223.76)	(630,223.76)	(630,223.76)	(630,223.76)	(630,223.76)	(630,223.76)	(630,223.76)	(630,223.76)	(630,223.76)	(630,223.76)
INTEREST	(24,418.00)	(27,913.00)	(30,418.00)	(33,422.00)	(36,426.00)	(39,430.00)	(42,434.00)	(45,438.00)	(48,442.00)	(51,446.00)	(54,450.00)	(57,454.00)
COMMODITY BALANCE	(603,119.00)	(658,129.00)	(582,307.00)	(269,054.00)	(487,540.00)	(1,077,242.00)	(933,272.00)	(806,154.00)	(677,723.00)	(536,435.00)	(402,845.00)	(269,605.00)
BEGINNING BALANCE - DEMAND	(578,701.00)	(630,216.00)	(551,889.00)	(235,031.00)	(442,720.00)	(988,722.00)	(846,638.00)	(720,712.00)	(539,381.00)	(398,029.00)	(278,395.00)	(212,151.00)
MONTHLY ACTIVITY - DEMAND												

Attachment 17

Chattanooga Gas Company
Summary of Transactions Deferred Gas Account
Twelve Months Ended June 30, 2008
Attachment A
Page 2 of 3

CHATTANOOGA GAS COMPANY COMPUTATION OF ACA FACTOR EFFECTIVE DECEMBER 1, 2008

ALLOCATION OF ACA REFUND/SURCHARGE TO RATE CLASSIFICATION BASED ON VOLUMES 12 MONTHS ENDED JUNE 30, 2008

RATE SCHEDULE	Contract Demand	Annual Commodity DT Sales	Demand	Commodity	TOTAL	Demand Per Unit DT	Demand Per Commodity Unit DT	Commodity Per Unit DT	TOTAL Per Commodity Unit DT
Firm Industrial (F-1&T-2)	12,588	1,290,330. \$	255,417 \$	(422,285) \$	(166,868) \$	1.6908		\$ (0.3273)	
Interruptible Industrial (I-1)		81,578	-	(26,698)	(26,698)			\$ (0.3273)	
Med Com & Ind (C-2)	30,284	2,587,236	614,452	(846,722)		\$ 1.6908		\$ (0.3273)	
T-3	1,460		29,632	-		\$ 1.6908			
ALL OTHER (R-1, R-4, C-1)	94,586	4,081,072	1,919,143	(1,335,608)	583,534		\$ 0.4703	\$ (0.3273)	\$ 0.1430
V-1									
TOTAL	138,918	8,040,216 \$	2,818,643 \$	(2,631,314) \$	187,330				

Chattanooga Gas Company
Summary of Transactions Deferred Gas Account
Twelve Months Ended June 30, 2008
Page 3 of 3

MCF SALES BY RATE CLASS AND OFF-SYSTEM REVENUE CREDIT ESTIMATE
August 31, 2008
TWELVE MONTHS ENDED:

Month	F-1	I-1	All Other	TOTAL	T-1, T-2 & T-3	TOTAL	
Jan-08	157,190	25,572	1,166,453	1,349,215	752,982	2,102,197	
Feb-08	196,054	6,226	1,319,799	1,522,079	774,721	2,296,800	16.8%
Mar-08	242,569	6,633	1,038,518	1,287,209	778,017	2,065,737	18.9%
Apr-08	198,185	6,426	566,993	771,604	689,855	1,461,459	16.0%
May-08	197,602	5,814	299,837	503,253	638,718	1,141,971	9.6%
Jun-08	208,145	5,630	211,092	424,867	608,582	1,033,449	6.3%
Jul-07	12,249	4,859	198,528	215,636	644,243	859,879	5.3%
Aug-07	12,674	4,062	182,656	199,392	662,018	861,410	2.7%
Sep-07	17,523	4,718	194,023	216,264	681,176	897,440	2.5%
Oct-07	17,151	4,450	211,108	232,709	705,496	938,205	2.7%
Nov-07	18,246	4,091	441,597	463,934	743,695	1,207,629	2.9%
Dec-07	12,742	3,097	837,704	853,543	704,291	1,557,834	5.8%
TOTAL	1,290,330	81,578	6,668,308	8,040,216	8,383,794	16,424,010	10.6%

Month	R-1	R-4	C-1	C-2	T-1*	T-2	T-3	F-1/T-2	T-3	C-2	Demand Determinates
Jan-08	652,851	1,373	129,872	382,357	515,930	199,169	37,883	12,569	2,067	30,965	45,601
Feb-08	715,852	1,409	176,474	426,064	551,825	189,860	33,036	12,706	2,091	30,299	45,096
Mar-08	552,433	1,170	114,635	370,280	556,951	194,386	26,680	12,761	2,042	31,109	45,912
Apr-08	279,701	617	59,961	226,714	504,921	161,970	22,964	12,761	2,257	28,544	43,562
May-08	127,005	536	24,803	147,493	455,277	164,709	18,732	12,761	2,215	29,757	44,733
Jun-08	77,760	400	16,116	116,816	426,799	164,305	17,478	13,146	2,185	29,757	45,088
Jul-07	68,009	406	24,690	105,423	489,040	148,547	6,656	12,388	411	30,120	42,919
Aug-07	61,354	401	12,076	108,825	505,694	148,494	7,830	12,388	469	29,687	42,544
Sep-07	66,182	356	22,524	104,961	517,948	154,104	9,124	12,428	511	29,151	42,090
Oct-07	72,844	304	14,092	123,868	533,589	160,729	11,178	12,428	618	31,498	44,544
Nov-07	235,176	593	27,145	178,683	554,622	173,183	15,890	12,403	712	31,477	44,592
Dec-07	464,030	1,056	76,866	295,752	520,354	159,789	24,148	12,321	1,947	31,038	45,306
TOTAL	3,373,197	8,621	699,254	2,587,236	6,132,950	2,019,245	231,599	151,060	17,525	363,402	531,987
								12,588	1,460	30,284	

* SS-1 and Discounted Volumes are included in T-1 Transportation and L-1 Sales.
September 2007 T-3 Demand used for each month September-December 2007.

Chattanooga Gas Company
Summary of Transactions Deferred Gas Account
Twelve Months Ended June 30, 2008
Attachment A
Page 3 of 3

MCF SALES BY RATE CLASS AND OFF-SYSTEM REVENUE CREDIT ESTIMATE
August 31, 2008
TWELVE MONTHS ENDED:

Month	F-1	I-1	All Other		TOTAL	T-1, T-2 & T-3			SUMMER		WINTER	
Jan-08	157,190	25,572	1,166,453		1,349,215	752,982			1,349,215		1,349,215	16.8%
Feb-08	196,054	6,226	1,319,799		1,522,079	774,721			1,522,079		1,522,079	18.9%
Mar-08	242,569	6,633	1,038,518		1,287,720	778,017			1,287,720		1,287,720	16.0%
Apr-08	198,185	6,426	566,993		771,604	689,855			771,604		771,604	9.6%
May-08	197,602	5,814	299,837		503,253	638,718				503,253	503,253	6.3%
Jun-08	208,145	5,630	211,092		424,867	608,582				424,867	424,867	5.3%
Jul-07	12,249	4,859	198,528		215,636	644,243				215,636	215,636	2.7%
Aug-07	12,674	4,062	182,656		199,392	662,018				199,392	199,392	2.5%
Sep-07	17,523	4,718	194,023		216,264	681,176				216,264	216,264	2.7%
Oct-07	17,151	4,450	211,108		232,709	705,496				232,709	232,709	2.9%
Nov-07	18,246	4,091	441,597		463,934	743,695				463,934	463,934	5.8%
Dec-07	12,742	3,097	837,704		853,543	704,291				853,543	853,543	10.6%
TOTAL	1,290,330	81,578	6,668,308		8,040,216	8,383,794				1,792,121	6,248,095	100%
					8,677,742	637,525.88						
									DEMAI			
Month	R-1	R-4	C-1	C-2	T-1*	T-2	T-3	F-1/T-2	T-3	C-2	Demand Determinates	
Jan-08	652,851	1,373	129,872		515,930	199,169	37,883	12,569	2,067	30,965	45,601	
Feb-08	715,852	1,409	176,474		551,825	189,860	33,036	12,706	2,091	30,299	45,096	
Mar-08	552,433	1,170	114,635		556,951	194,386	26,680	12,761	2,042	31,109	45,912	
Apr-08	279,701	617	59,961		504,921	161,970	22,964	12,761	2,257	28,544	43,562	
May-08	127,005	536	24,803		455,277	164,709	18,732	12,761	2,215	29,757	44,733	
Jun-08	77,760	400	16,116		426,799	164,305	17,478	13,146	2,185	29,757	45,088	
Jul-07	68,009	406	24,690		489,040	148,547	6,656	12,388	411	30,120	42,919	
Aug-07	61,354	401	12,076		505,694	148,494	7,830	12,388	469	29,687	42,544	
Sep-07	66,182	356	22,524		517,948	154,104	9,124	12,428	511	29,151	42,090	
Oct-07	72,844	304	14,092		533,589	160,729	11,178	12,428	618	31,498	44,544	
Nov-07	235,176	593	27,145		554,622	173,183	15,890	12,403	712	31,477	44,592	
Dec-07	464,030	1,056	76,866		520,354	159,789	24,148	12,321	1,947	31,038	45,306	
TOTAL	3,373,197	8,621	699,254		6,132,950	2,019,245	231,599	151,060	17,525	363,402	531,987	
								12,588	1,460	30,284		

* SS-1 and Discounted Volumes are included in T-1 Transportation and L-1 Sales.
September 2007 T-3 Demand used for each month September-December 2007.

CHATTANOOGA GAS COMPANY
GAS TARIFF
TRA NO. 1

Eighty Fourth Revised Sheet No. 55

CURRENT LEVEL OF SURCHARGES AND REFUND CREDITS

AMOUNTS INDICATED BELOW APPLY TO THE BILLING DETERMINANTS
OF EACH INDIVIDUAL TARIFF

RATES	F-1	F-1	I-1	T-2	T-3	R-1	R-4	C-1	C-2	C-2	A/C	V-1
	Commercial and Industrial Large Volume Firm Sales Service	Commercial and Industrial Large Volume Firm Sales Service	Commercial and Industrial Interruptible Sales Service	Interruptible Transportation Service With Firm Gas Supply Backup	Low Volume Transport Demand	Residential	Multi-Fami	Small Commercial and Industrial	Medium Commercial and Industrial Demand	Medium Commercial and Industrial Commodity	Residential and Commercial Air Conditioning	Natural Gas Vehicle Service
Billing Unit	Demand DT	Commodity DT	Commodity DT	Demand DT	Demand DT	Therm	Therm	Therm	DT	Therm	Therm	Therm
IMCR Refund	(1.3159)	0.0000	0.0000	(1.3159)	(1.3159)	(0.0383)	(0.0383)	(0.0383)	(1.3159)	0.0000	0.0000	0.0000
ACA 12-08*	1.6908	(0.3273)	(0.3273)	1.6908	1.6908	0.0143	0.0143	0.0143	1.6908	(0.0327)	(0.0327)	0.0000
TOTAL	0.3749	(0.3273)	(0.3273)	0.3749	0.3749	(0.0240)	(0.0240)	(0.0240)	0.3749	(0.0327)	(0.0327)	0.0000

*IMCR refund made effective July 1, 2007 terminated Effective June 30, 2008.

** Effective December 1, 2008. ACA01-08 Effective January 1, 2008 terminated November 30, 2008.

EFFECTIVE: December 1, 2008.

Question 23:

Please state the amount of the annual gas asset management services payment shared with CGC's Tennessee ratepayers for the last four fiscal years ended December 31, 2007.

Response:

In accordance with the Company's tariff, the gains from non-jurisdictional transactions the related sharing were reported on a calendar year basis for years ended December 31, 2004 and 2005. In 2007 the tariff was modified to provide that the reporting period that coincides with the Company's Fiscal Year, or if the Company has an asset management agreement, the accounting/recovery period that coincides with the contract year of the agreement. As a result, the most recent report was for the fifteen months ended March 31, 2007. The next report and determination of the amount to be shared will be for the twelve months ending March 31, 2008. The amounts shared with CGC's Tennessee ratepayers are as follows:

	Amount Credited to Customer
Calendar Year ended 12/31/2004	\$ 1,808,649
Calendar Year ended 12/31/2005	\$ 4,386,330
15 Months Ended 3/31/2007	\$ 1,763,341
12 Months Ended 3/31/2008	\$ 2,242,861 a/

A copy of the report for the twelve months ending March 31, 2008 will be provided when filed.

a/ Updated data provided 5/12/2009

The data for the twelve months ended March 31, 2008 was provided to the CAPD when the report for that period was filed with the TRA. The cover letter of that transmittal to the CAPD was dated May 30, 2008, and noted that portions of the report are marked as Confidential. These Confidential pages must be maintained under seal and protected pursuant to the Agreed Protective Order dated March 4, 2008 in TRA Docket 07-00224.

Question 24:

Please provide a complete copy of Sequent's book of profits and losses for Tennessee for the time period from January 1, 2004 through the present by calendar year, or copies of the documents whether or not they are kept in the form of a book.

Revised Response:

See attached for the IMCR filings and the Chattanooga book from October 2004-present.

CONFIDENTIAL - Please note the attachments to this response are confidential and subject to the Agreed Protective Order dated March 4, 2008 in TRA Docket 07-00224.

CGC is supplementing this response to update the Chattanooga Book to present. This information is provided in electronic format on the enclosed CD labeled Docket No. 07-00224 Updated #24 Response CONFIDENTIAL Chatt. Book, which is Confidential and subject to the Agreed Protective Order dated March 4, 2008 in TRA Docket 07-00224. The IMCR filing for the twelve months ended March 31, 2008 was provided to the CAPD when the report for that period was filed with the TRA. The cover letter of that transmittal to the CAPD was dated May 30, 2008, and noted that portions of the report are marked as Confidential. These Confidential pages must be maintained under seal and protected pursuant to the Agreed Protective Order dated March 4, 2008 in TRA Docket 07-00224.

Question 27:

Produce copies of all of Sequent's Tennessee franchise and excise tax returns for the years ended December 31, 2004, December 31, 2005, December 31, 2006, and December 31, 2007.

Response

Please see attached for Sequent's Tennessee franchise and excise tax returns for the year ending December 31, 2006. Sequent was not required to file for the years 2004 and 2005. Sequent has filed for an extension for the 2007 return, which will be due on October 15, 2008.

Please note this attachment to this response is Confidential, provided under seal and is to be protected as required by the Agreed Protective Order dated March 4, 2008 in TRA Docket 07-00224.

CGC is supplementing this response by providing a copy of the 2007 return, which is CONFIDENTIAL and subject to the Agreed Protective Order dated March 4, 2008 in TRA Docket 07-00224.

Question 30:

Please provide Sequent's total dollar amount and volume of sales related to the asset management contracts between Sequent and CGC for the fiscal years ended December 31, 2004, December 31, 2005, December 31, 2006, and December 31, 2007.

Response:

In accordance with the Company's tariff, the gains from non-jurisdictional transactions the related sharing were reported on a calendar year basis for years ended December 31, 2004 and 2005. In 2007 the tariff was modified to provide that the reporting period that coincides with the Company's Fiscal Year, or if the Company has an asset management agreement, the accounting/recovery period that coincides with the contract year of the agreement. As a result, the most recent report was for the fifteen months ended March 31, 2007. The next report and determination of the amount to be shared will be for the twelve months ending March 31, 2008. The Sales volumes and Revenue are provided consistent with the sharing reporting periods. The data for the twelve months ended March 31, 2008 will be provided when the report for that period is completed.

	Sales Volume Dth	Value	
12 Months Ended 12/31/2004	32,055,627	\$ 193,083,818	a/
12 Months Ended 12/31/2005	33,421,172	\$ 296,050,297	
15 Months Ended 3/31/2007	30,851,338	\$ 219,646,711	
12 Months Ended 3/31/2008	22,345,514	\$ 166,343,803	b/

a/ Includes 1,000 Dth Capacity Release and \$11,000 Capacity Release Revenue

b/Updated data provided 5-12-2009

The data for the twelve months ended March 31, 2008 was provided to the CAPD when the report for that period was filed with the TRA. The cover letter of that transmittal to the CAPD was dated May 30, 2008, and noted that portions of the report are marked as Confidential. These Confidential pages must be maintained under seal and protected pursuant to the Agreed Protective Order dated March 4, 2008 in TRA Docket 07-00224.

Question 34:

Please provide copies of all asset management contracts between Sequent and entities other than CGC for the time period from January 1, 2004 through the present.

Question 35:

Please provide copies of all asset management contracts between AGL affiliates and their asset managers for the time period from January 1, 2004 through the present.

Revised Response:

Attached are the asset managements between Sequent and AGL affiliates.

CONFIDENTIAL - Please note the supplemental attachments to this response are confidential and subject to the Agreed Protective Order dated March 4, 2008 in TRA Docket 07-00224.

CGC is supplementing this response to include the attached CONFIDENTIAL Asset Management and Agency Agreement between Virginia Natural Gas, Inc. and Sequent Energy Management, L.P., that became effective April 1, 2009, after approval by the State Corporation Commission of the Commonwealth of Virginia. The supplemental attachment to this response is Confidential and subject to the Protective Order dated March 4, 2008 in TRA Docket 07-00224.