

FARMER & LUNA

A PROFESSIONAL LIMITED LIABILITY COMPANY

ATTORNEYS AT LAW

333 UNION STREET
SUITE 300
NASHVILLE, TENNESSEE 37201

TELEPHONE (615) 254-9146
TELECOPIER (615) 254-7123
www.farmerluna.com

Jennifer L. Brundige
jbrundige@farmerluna.com

April 18, 2008

VIA ELECTRONIC MAIL

filed electronically in docket office 4/18/2008

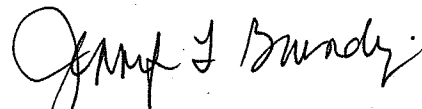
Timothy Phillips, Esq.
Stephen Butler, Esq.
Consumer Advocate and Protection Division
Office of the Attorney General & Reporter
2nd Floor, 425 5th Avenue North
Nashville, TN 37243-0491

Re: Docket 07-00224

Dear Tim and Steve:

On April 11, 2008, Chattanooga Gas Company ("CGC") provided the Consumer Advocate and Protection Division ("CAPD") with its responses to 86 of the 90 (not including subparts) discovery requests propounded by the CAPD during the first round of discovery in the above referenced docket. Enclosed please find CGC's responses to the four remaining discovery requests (Nos. 14, 15, 72, and 81).

Sincerely yours,



Jennifer L. Brundige

Enclosures

cc: Kelly Cashman-Grams
TRA Docket Room
Elizabeth Wade, Esq.

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

April 18, 2008

IN RE:)	
)	
DOCKET TO EVALUATE CHATTANOOGA)	Docket No. 07-00224
GAS COMPANY'S GAS PURCHASES AND)	
RELATED SHARING INCENTIVES)	
)	

**CHATTANOOGA GAS COMPANY'S RESPONSES AND OBJECTIONS
TO CAPD'S FIRST DISCOVERY REQUESTS**

Chattanooga Gas Company ("CGC" or "Company") is filing its Responses to Discovery Request Nos. 14, 15, 72, and 81 propounded by the Consumer Advocate and Protection Division ("CAPD") during the first round of discovery. As the CAPD was permitted to exceed the scope of discovery as set forth in Rule 1220-1-2-.11 and served 90 (not including subparts) discovery requests, CGC requested an additional week to provide the CAPD with the following 4 responses.

CGC incorporates by reference herein the General Objections that it set forth in its filing on April 11, 2008.

Question 14

For all CGC jurisdictions included in the gas supply plans provided in accordance with First Discovery Request No. 13, above, please provide the number of CGC customers and related customer volumes, by customer class, by state, for each year of the last ten fiscal years ended December 31, 2007.

Response:

Since CGC operates only in Tennessee, all customer and volume data is Tennessee only. Attachment A identifies the average number bills (customers) and the corresponding billed volumes by customer class for the ten years ended December 2007. In using this data for analysis purposes, it should be recognized that usage measured on a cycle basis may vary materially from the amount of gas that is actually delivered based on a measurement taken on the last day of the period. The variability of the weather in December may have a pronounced impact as can the variance in the number of days included in the meter read cycles as a result of the holiday period in November and December.

See attachment A.

Cycle Billed Volumes

	R-1 Residential	R-4 Multi-Family	C-1 General Service	I-1 Industrial Sales	L-1 Limited Availability	T-1 Interruptible Transport	T-2 Interruptible With Firm Sales Backup	I1/T2 Firm Sales Backup Interruptible Transport	L1/T1 Interruptible Transport with Interruptible Sales	SS1 Negotiated Rate
1998	3,364,082	33,820	3,649,856	906,328	2,009,651	6,527,748	1,274,942	1,535,634	6,832,927	969,851
1999	3,379,919	24,958	3,553,181	1,043,877	2,971,027	5,593,005	800,315	1,896,606	5,657,145	880,918
2000	3,647,448	28,968	3,709,890	536,174	1468,430	1,938,256	117,247	1,766,131	5,287,604	1,056,424
2001	3,804,028	31,888	4,437,232					1,899,495	4,373,876	1,341,130
2002	3,632,470	19,722	3,621,398					2,703,423	5,126,169	787,446
2003	3,402,357	10,975	3,558,694					2,231,574	4,217,489	659,939
2004	3,615,909	10,103	3,651,029					2,807,889	2,986,062	1,777,135
2005	3,555,655	6,864	3,522,699							
2006	3,436,174	10,202	3,623,423							
2007	3,336,133	8,421	1,120,718			3,194,347				
					I-1 Interruptible Sales 52,664			F1/T2 Transport with Firm Sales Backup 1,972,127	F1/T2/T1 Transport with Firm Sales Backup and Interruptible Sales 1,351,513	T-3 Low Volume Transport 124,843

Dec 1998 customer count data not available.
2000 I-1, L-1, T-1, and T-2 Average bills and volumes are for Jan-May.

Question 15

Please provide CGC's total throughput for the Tennessee jurisdiction for the last ten fiscal years ended December 31, 2007.

Response:

The below table represents the total throughput from January 1 through December 31 of each year.

Year	Total Throughput (Dth)
1998	18,295,729
1999	18,785,246
2000	18,660,328
2001	16,870,076
2002	16,906,804
2003	16,867,397
2004	16,698,551
2005	16,264,234
2006	15,765,196
2007	14,939,141

Question 72:

Explain fully how CGC or Atlanta Gas determined that CGC would not be the operator of the delivery points where East Tennessee delivers to CGC, those shown in Table One. Include in your reply the advantages or disadvantages that accrued to CGC or any affiliated entity and to its ratepayers as a result of CGC not being an operator of the delivery points.

Response:

Delivery points 59001, 59007, 59016, 59017, 59024, 59106, 59108, 59142, 59151 make up the FIRM delivery points for CGC service territory.

Delivery point 59014 is an AGL (IT ONLY) delivery point in the AGL service territory.

AGLR Gas Control manages CGC's deliveries points independently from the one AGL delivery point daily/monthly.

AGLR Accounting tracks (AGL and CGC) nominations vs. deliveries independent to one another.

Question 81

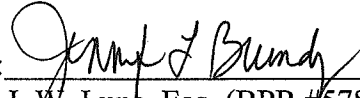
Explain fully why CGC had an excess of receipt capacity for the quarters 200510 (October 2005) through 200610 (October 2006), how the receipt capacity was used, and whether that excess receipt capacity was used by CGC or Sequent.

Response:

CGC does not believe the East Tennessee Pipeline's electronic bulletin board system was accurate when it appeared to indicate that the receipt capacity exceeded the contract capacity. At no time has CGC had excess receipt capacity. CGC has requested East Tennessee to provide detail as to why the information was displayed on the bulletin board posting. To date, CGC has not received a response from East Tennessee. CGC will provide that response to the CAPD as soon as we receive it from East Tennessee.

Respectfully submitted,

FARMER & LUNA, PLLC

By: 
J. W. Luna, Esq. (BPR #5780)
Jennifer L. Brundige, Esq. (BPR #20673)
333 Union Street, Suite 300
Nashville, TN 37201
(615) 254-9146

Attorneys for Chattanooga Gas Company

CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing has been forwarded by electronic mail on this the 18th day of April, 2008, to the following:

Eddie Roberson, Chairman
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243-00505

Kelly Cashman-Grams, Hearing Officer (response w/o attachments)
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243-00505

Cynthia E. Kinser (Mills), Deputy
Timothy C. Phillips
Stephen R. Butler
Consumer Advocate and Protection Division
Office of Attorney General
2nd Floor
425 5th Avenue North
Nashville, TN 37243-0491

