

RECEIVED

2009 SEP -3 AM 8:13

BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE

September 2, 2009

IN RE:)
)
CHATTANOOGA GAS COMPANY) **Docket No. 09-00128**
WEATHER NORMALIZATION ADJ. (WNA) AUDIT)

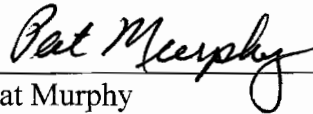
**NOTICE OF FILING BY THE UTILITIES DIVISION OF THE TENNESSEE
REGULATORY AUTHORITY**

Pursuant to Tenn. Code Ann. §§ 65-4-104, 65-4-111 and 65-3-108, the Utilities Division of the Tennessee Regulatory Authority (the "Utilities Division") hereby gives notice of its filing of the Chattanooga Gas Company WNA Audit Report in this docket and would respectfully state as follows:

1. The present docket was opened by the Authority to hear matters arising out of the audit of Chattanooga Gas Company (the "Company").
2. The Company's WNA filings were received on November 1, 2008 through April 30, 2009, and the Staff completed its audit of same on August 31, 2009.
3. Since there were no findings, the Utilities Division did not issue a preliminary WNA audit report to the Company.
4. The Report is attached hereto as Exhibit A and is fully incorporated herein by this reference. The Report contains the audit findings of the Utilities Division.

5. The Utilities Division hereby files its Report with the Tennessee Regulatory Authority for deposit as a public record and approval of the findings and recommendations contained therein.

Respectfully Submitted:

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

Pat Murphy
Utilities Division
Tennessee Regulatory Authority

CERTIFICATE OF SERVICE

I hereby certify that on this 2nd day of September 2009, a true and exact copy of the foregoing has been either hand-delivered or delivered via U.S. Mail, postage pre-paid, to the following persons:

Sara Kyle
Chairman
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243

Mr. Archie Hickerson
Director - Regulatory Affairs
AGL Resources, Inc.
150 W. Main Street, Suite 1510
Norfolk, Virginia 23510

Ms. Leigh Garrett
AGL Resources, Inc.
5100 E. Virginia Beach Boulevard
Norfolk, Virginia 23502

Mr. Terry Buckner
Office of the Attorney General
Consumer Advocate and Protection Division
P.O. Box 20207
Nashville, TN 37202-0207


Pat Murphy

EXHIBIT A

COMPLIANCE AUDIT REPORT

OF

CHATTANOOGA GAS COMPANY

WEATHER NORMALIZATION ADJUSTMENT (WNA) RIDER

DOCKET NO. 09-00128

TENNESSEE REGULATORY AUTHORITY

UTILITIES DIVISION

September 2009

COMPLIANCE AUDIT
CHATTANOOGA GAS COMPANY
WEATHER NORMALIZATION ADJUSTMENT (WNA) RIDER
Docket No. 09-00128

TABLE OF CONTENTS

<u>NO.</u>		<u>PAGE</u>
I.	INTRODUCTION	1
II.	SCOPE OF AUDIT	1
III.	BACKGROUND INFORMATION ON THE COMPANY	2
IV.	BACKGROUND ON WEATHER NORMALIZATION ADJ. RIDER	2
V.	IMPACT OF WNA RIDER	3
VI.	WNA FINDINGS AND CONCLUSIONS	5
ATTACHMENT 1	SECOND REVISED TARIFF SHEET NO. 49 AND SIXTH REVISED SHEET NO. 49A <u>WEATHER NORMALIZATION ADJUSTMENT (WNA) RIDER</u>	

COMPLIANCE AUDIT
CHATTANOOGA GAS COMPANY
WEATHER NORMALIZATION ADJUSTMENT (WNA) RIDER
DOCKET NO. 09-00128

I. INTRODUCTION AND AUDIT OPINION

The subject of this compliance audit is the Weather Normalization Adjustment (“WNA”) Rider of Chattanooga Gas Company (“CGC” or “Company”), a wholly owned subsidiary of AGL Resources, Inc. The objective of this audit was to determine if the WNA adjustments were calculated correctly and applied to customers’ bills appropriately between November 2008 and April 2009 for CGC. As a result of the WNA Rider, the Company surcharged a net \$110,209 and \$77,152 to the residential and commercial customers respectively during the period. The impact of WNA revenues on the Company’s total revenues for these classes is detailed in Section V.

The audit produced no findings. Therefore, Staff concludes that the Company is correctly implementing the mechanics of the WNA Rider as specified by the Tennessee Regulatory Authority (“TRA” or the “Authority”) and included in the Company’s tariff (See Attachment 1).

II. SCOPE OF AUDIT

In meeting the objective of the audit, the Staff compared the following on a daily basis:

- (1) the Company's actual heating degree days to National Oceanic and Atmospheric Administration (“NOAA”) actual heating degree days;
- (2) the Company's normal heating degree days to the normal heating degree days calculated and approved in CGC’s last rate case; and
- (3) the Company's calculation of the WNA factor to Staff's calculation for each billing cycle during the WNA period.

Staff audited a sample of customer bills to verify that the WNA factor had been correctly applied to the bills. The Staff also examined each sample bill to determine whether the Base Rates and Purchased Gas Adjustments were billed correctly. No discrepancies were noted; therefore, Staff concludes that the Company is accurately billing its customers.

Pat Murphy and Patsy Fulton of the Utilities Division conducted this audit.

III. BACKGROUND INFORMATION ON THE COMPANY

Chattanooga Gas Company, with its headquarters at 6125 Preservation Drive, Chattanooga, Tennessee, is a wholly owned subsidiary of AGL Resources, Inc., which has its headquarters at Ten Peachtree Place, Atlanta, Georgia. CGC is a gas distributor, which provides service to the cities of Chattanooga and Cleveland and surrounding environs in Hamilton and Bradley counties, all located in Southeast Tennessee. The natural gas used to serve these areas is purchased by Sequent Energy Management ("Sequent" or "SEM")¹ from various suppliers and transported by Tennessee Gas Pipeline ("TGP"), East Tennessee Natural Gas ("ETNG") and Southern Natural Gas ("SNG") under tariffs approved by the Federal Energy Regulatory Commission ("FERC").

IV. BACKGROUND ON WEATHER NORMALIZATION ADJUSTMENT RIDER

On September 26, 1991, the Tennessee Public Service Commission² ("TPSC") approved a three-year experimental Weather Normalization Adjustment Rider to the tariffs of Chattanooga Gas Company, Nashville Gas Company, a division of Piedmont Gas Company, Inc. and United Cities Gas Company.³ The WNA Rider was to be applied to residential and commercial customers' bills during the months of October through May of each year (*See* Attachment 1). On June 21, 1994, the TPSC issued an Order authorizing the above mentioned gas companies to permanently implement an amended version of the WNA Rider.⁴ The TRA Staff audits these calculations annually.

In setting rates, the Tennessee Regulatory Authority uses a normalized level of revenues and expenses for a test year, which is designed to be the most reasonable estimate of the Company's operations during the time the rates are to be in effect. Use of normalized operating levels eliminates unusual fluctuations that may occur during the test period, which causes rates to be set too high or too low.

Specifically, one part of normalizing revenues consists of either increasing or decreasing the test year weather related sales volumes to reflect the difference between the normal and actual heating degree days. (A heating degree day is calculated as the difference in the average daily temperature and 65 degrees Fahrenheit.) This average daily temperature constitutes normal weather and is determined based on the previous thirty years' weather data.

Normal weather rarely occurs. This has two impacts:

- (1) The customers' bills fluctuate dramatically due to changes in weather from month to month; and

¹ Sequent is a marketing affiliate of CGC and Asset Manager for CGC.

² By legislative action, the Public Service Commission was replaced on July 1, 1996 by the Tennessee Regulatory Authority. *See* Act of May 24, 1995, ch. 305, 1995 Tenn. Pub. Acts 450. The TRA retains jurisdiction over the above named gas companies. *See* Tenn. Code Ann. § 65-4-104; *see also* Tenn. Code Ann. § 65-4-101 (a) (defining public utility).

³ *See* petition of Chattanooga Gas Company, Nashville Gas Company, a Division of Piedmont Natural Gas Company, Inc. and United Cities Gas Company for a Rulemaking Hearing to Adopt a Weather Normalization Adjustment (WNA) Rider, Docket No. 91-01712, *Order* (September 26, 1991).

⁴ The amendment directed Chattanooga Gas Company and United Cities Gas Company to eliminate from their WNA Rider the shoulder months of October and May, and Nashville Gas Company to eliminate the shoulder months of October, April and May.

- (2) The gas companies earn more or less than their authorized rate of return. For example, if weather is colder than normal, then more gas than anticipated in the rate case will be sold. This results in higher customer bills and overearnings for the company. On the other hand, if weather is warmer than normal, less gas than anticipated in the rate case will be sold, the customers' bills will be lower and the company will underearn.

In recognition of this fact, the TRA approved an experimental WNA mechanism, which became permanent on June 21, 1994, to reduce the impact abnormal weather has on the customers' bills and on the gas utilities' operations. In periods of weather colder than normal, the customer receives a credit on his bill, while in periods of warmer than normal weather, the customer is billed a surcharge. Thus, customers' monthly bills should not fluctuate as dramatically and the gas company should have a more stable rate of return.

V. IMPACT OF WNA RIDER

The graph appearing at the end of this section compares the actual heating degree days to normal heating degree days for Chattanooga Gas during the 2008 - 2009 winter heating season. The table below quantifies the number of actual heating degree days by month as compared to the normal heating degree days for that month. It shows that overall the weather was 2.97% warmer than normal, resulting in a net surcharge to CGC's customers for the period.

Month	Actual Heating Degree Days	Normal Heating Degree Days	Warmer/Colder than Normal	Percentage Change
October 2008	171	165	Colder	-3.64%
November 2008	510	415	Colder	-22.89%
December 2008	610	697	Warmer	12.48%
January 2009	767	795	Warmer	3.52%
February 2009	535	581	Warmer	7.92%
March 2009	362	404	Warmer	10.40%
April 2009	181	175	Colder	3.43%
Total	3,136	3,232	Warmer	2.97%

The overall winter period for Chattanooga was warmer than normal. As a result, the net impact of the WNA Rider during the November 2008 through April 2009 WNA period was that residential and commercial customers were **surcharged** an additional \$110,209 and \$77,152 respectively. The percentage of total residential and commercial revenue derived from the WNA Rider was 0.28% and 0.25% respectively (See Table 1). This is a decrease from the previous year when the residential and commercial customers were **surcharged** \$614,790 and \$395,240 respectively (See Table 2).

Table 1

**Impact of WNA Rider on Residential & Commercial Revenues
November 2008 – April 2009**

	<u>WNA Rider Revenues</u>	<u>Total Revenues</u>	<u>Percentage Impact of WNA Rider on R&C Revenues</u>
Residential Sales	\$110,209	\$39,947,576	0.28%
Commercial Sales	<u>77,152</u>	<u>30,582,881</u>	0.25%
Total	<u>\$187,361</u>	<u>\$70,530,457</u>	0.27%

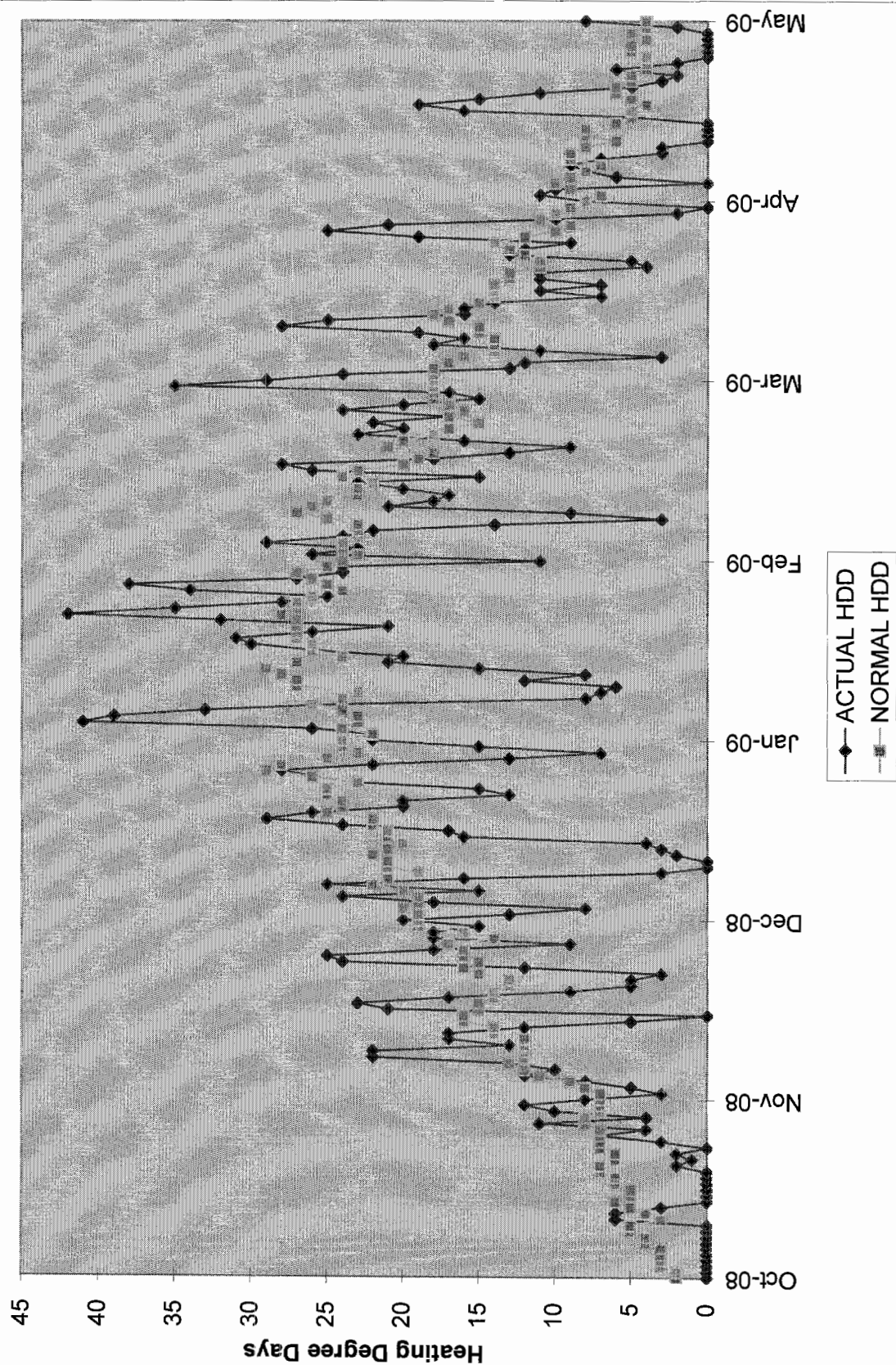
Table 2

**Amount Surcharged (Refunded)
2006 - 2009**

	<u>Residential</u>	<u>Commercial</u>	<u>Total Surcharge/(Refund)</u>
11/06-4/07	\$659,923	\$539,019	\$1,198,942
11/07-4/08	614,790	395,240	1,010,030
11/08-4/09	<u>110,209</u>	<u>77,152</u>	<u>187,361</u>
Total	<u>\$ 1,806,571</u>	<u>\$ 1,372,289</u>	<u>\$ 3,178,860</u>

Chattanooga Gas Company

Comparison of Actual to Normal Heating Degree Days



VI. WNA FINDINGS AND CONCLUSIONS

As noted in Section I of this report, Staff's audit produced no findings. Therefore, Staff concludes that the Company is correctly implementing the mechanics of the WNA Rider as specified by the Tennessee Regulatory Authority ("TRA" or the "Authority") and included in the Company's tariff (See Attachment 1).

WEATHER NORMALIZATION ADJUSTMENT

(WNA) RIDER

PROVISION FOR ADJUSTMENT

The base rate per CCF/therm (100,000 Btu) for gas service set forth in any rate schedules utilized by the Authority in determining normalized test period revenues shall be adjusted by an amount hereinafter described, which amount is referred to as the "Weather Normalization Adjustment."

DEFINITIONS

For Purpose of this Rider:

"Authority" means the Tennessee Regulatory Authority.

"Relevant Rate Order" means the final order of the Authority in the most recent litigated rate case of Chattanooga Gas Company (Company) fixing the rates of the Company or the most recent final order of the Authority Specifically prescribing or fixing the factors and procedures to be used in the application of this Rider.

COMPUTATION OF WEATHER NORMALIZATION ADJUSTMENT

The Weather Normalization Adjustment shall be computed to the nearest one-hundredth cent per CCF/therm by the following formula:

$$WNA_i = R_i \frac{HSF_i(NDD-ADD)}{(BL_i + (HSF_i \times ADD))}$$

Where

- | | | |
|------------------|---|--|
| i | = | any particular Rate Schedule or billing classification within any such particular Rate Schedule that contains more than one billing classification |
| WNA _i | = | Weather Normalization Adjustment Factor for the i th Rate Schedule or classification expressed in cents per CCF/therm |
| R _i | = | weighted average base rate (base rate less any embedded gas cost) of temperature sensitive sales for the i th schedule or classification utilized by the Authority in the Relevant Rate Order for the purpose of determining normalized test year revenues |
| HSF _i | = | heat sensitive factor for the i th schedule or classification utilized by the Authority in the Relevant Rate Order for the purpose of determining normalized test year revenues |
| NDD | = | normal billing cycle heating degree days utilized by the Authority in the Relevant Rate Order for the purpose of determining normalized test year revenues |
| ADD | = | actual billing cycle heating degree days |
| BL _i | = | base load sales for the i th schedule or classification utilized by the Authority in the Relevant Rate Order for the purpose of determining normalized test year revenues |

FILING WITH AUTHORITY

The Company will file as directed by the Authority (a) a copy of each computation of the Weather Normalization Adjustment, (b) a schedule showing the effective date of each such Weather Normalization Adjustment, and (c) a schedule showing the factors or values derived from the Relevant Rate Order used in calculating such Weather Normalization Adjustment.

ISSUED: OCTOBER 11, 2004
ISSUED BY: STEVE LINDSEY, VP

EFFECTIVE: OCTOBER 1, 2004

CHATTANOOGA GAS COMPANY
GAS TARIFF
TRA NO. 1

SIXTH REVISED SHEET NO.49A

WEATHER NORMALIZATION ADJUSTMENT

(WNA) RIDER COMPONENTS

<u>RATE SCHEDULE</u>	<u>WEIGHTED BASE RATE (\$THERM)</u>	<u>HEAT SENSITIVE FACTOR - HSF (THERM)</u>	<u>BASE LOAD - BL (THERM)</u>	
<u>(R-1) RESIDENTIAL GENERAL SERVICE</u> Winter (November - April)	.182590	.171325	12.133	C
<u>(R-4) MULTI-FAMILY HOUSING SERVICE</u> Winter (November - April)	.217674	.068798	17.033	C
<u>(C-1) SMALL COMMERCIAL AND INDUSTRIAL GENERAL SERVICE</u> Winter (November - April)	.185810	.240546	9.433	C
<u>(C-2) MEDIUM COMMERCIAL AND INDUSTRIAL GENERAL SERVICE</u> Winter (November - April)	.169998	2.661820	813.367	N

ISSUED:NOVEMBER 20, 2006
ISSUED BY: STEVE LINDSEY, VP

EFFECTIVE: JANUARY 1, 2007