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Jennifer L. Brundige
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February 17, 2010

VIA HAND DELIVERY

filed electronically in docket office on 02/17/10

Chairman Sara Kyle
c/o Sharla Dillon
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243-00505

Re: Docket No. 09-00183

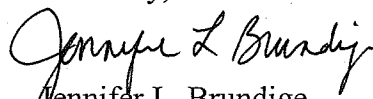
Dear Chairman Kyle:

Chattanooga Gas Company ("CGC") is filing in the above referenced docket one copy of its responses to nos. 46, 138, 193, and 194 of the first set of discovery requests propounded by the Consumer Advocate and Protection Division ("CAPD") of the Office of Attorney General. Also, included in this filing are CGC's revised response for request no. 57 and attachments 42-2 and 88-1 which were inadvertently omitted when CGC previously filed its responses to discovery request nos. 42 and 88.

Further, CGC filed confidential attachments for its response to discovery request no. 58 on February 5, 2010; however, CGC did not label the attachments as 58-1, 58-2, and 58-3 as indicated in its response. To avoid any confusion, CGC is re-filing these confidential attachments with the correct labels of 58-1, 58-2, and 58-3 on the respective documents. Since these documents contain confidential information, CGC is submitting them again under seal in good faith reliance on the entry of the TRA's standard protective order filed by the Company.

Please do not hesitate to contact me if you have any questions or concerns.

Sincerely,


Jennifer L. Brundige

Enclosures

February 17, 2009

Page 2

cc: Gary Hotvedt, Esq.
Pat Murphy
Cynthia Kinser, Esq.
C. Scott Jackson, Esq.
Ryan McGehee, Esq.
T. Jay Warner, Esq.
Henry M. Walker, Esq.
Elizabeth Wade, Esq.
Archie Hickerson

DISCOVERY REQUEST NO. 46:

Provide the amount and account for any non-recurring charges, such as non-jurisdictional expenses, Outside Service Expenses, and outsourcing call center costs recorded in the twelve months ended 12/31/09.

Response:

Please see attachments 46-1 through 46-9.

Chattanooga Gas Company
Elimination of non-jurisdictional expenses and other adjustments
For the Year Ended December 31, 2009

Civic Participation (Schedule 46-2)	
Direct Allocations	(15,000)
To eliminate non-jurisdictional civic participation.	(16,746)
Promotional Advertising (Schedule 46-3)	
Direct Allocations	(32,076)
To eliminate promotional advertising.	(3,880)
Call Center (Schedule 46-4)	
Direct Allocations	0
To adjust expenses to reflect in-sourcing of call center.	274,975
Goodwill (Schedule 46-5)	
Direct Allocation	0
To eliminate goodwill advertising.	(493)
Total outside meter reading services (Schedule 46-6)	
Direct Allocation	(129,808)
To eliminate outside meter reading cost no longer incurred due to automation of meter reading.	0
Property Tax (Schedule 46-7)	
Direct Allocation	0
To adjust property tax accrual for amounts per 2009 payments.	(165,163)
PUHCA tax allocation (Schedule 46-8)	
Direct Allocation	0
To eliminate effects of non-jurisdictional tax allocation amounts.	73,531

Chattanooga Gas Company
Civic Participation
For the Year Ended December 31, 2009

Direct GL8	670120	Civic Participation - Other	0
	670122	Civic Participation-Commun Dev	15,000
		Total Direct Charges	15,000
Allocated GL29		AGL Service Company Amounts	
	670120	Civic Participation - Other	523,261
	670122	Civic Participation-Commun Dev	8,000
			531,261
		Allocation percentage	3.15%
		Allocated civic participation	16,746

**Chattanooga Gas Company
Promotional Advertising
For the Year Ended December 31, 2009**

Direct			
GL8	660001	Residential Sales Promotion	30,553
GL8	660005	Advertising - Print	0
GL8	660006	Marketing - Direct Mail/Email	32,770
GL8	660007	Marketing - Collateral	0
GL8	660012	Sponsorship & Events/Tradeshows	650
GL8	660300	Marketing Expenses - General	8,259
GL8	660400	Vendor/Agency Support	(26,529)
		Total Direct Charges Recorded	45,703

Informational Advertising

		Informational (Net of Co-op Reimbursements Recorded)	(17,024)
		Total Direct Promotional to be eliminated	28,679
		Co-op amounts to be received for Informational Adv.	3,397
		Total Adjustment to Recorded Advertising	32,076

Allocations		AGL Service Company Amounts	
GL29	600112	Pay - Promotional Advertising	
GL29	660001	Residential Sales Promotion	
GL29	660002	Comm & ACN Sales Promotion	
GL29	660003	Miscellaneous Sales Promotion	1,656
GL29	660004	Advertising - TV/Radio	
GL29	660005	Advertising - Print	
GL29	660006	Marketing - Direct Mail/Email	43
GL29	660007	Marketing - Collateral	
GL29	660008	Market Research and Analysis	55,860
GL29	660009	Marketing - Channel Programs	12,995
GL29	660010	Marketing - Channel Development	
GL29	660011	Marketing - Retail Partnership	
GL29	660012	Sponsorship & Events/Tradeshows	11,000
GL29	660100	Selling Expenses	5,000
GL29	660300	Marketing Expenses	36,522
			123,075
		Allocation percent	3.15%
		Total Allocated Charges	3,880

**Chattanooga Gas Company
Adjust to include in-sourcing of Call Center
For the Year Ended December 31, 2009**

Include In-sourcing of Call Center
See TRA FG Schedule 25-12e, page 3 of 3
1,070,999

Eliminate Allocated Call Center Costs

Allocations	Expenses Allocated to CGC
	208,103
	48,855
	18,212
	52,447
	59,864
	324,720
Total Allocated Charges	712,201

Direct Assigned Payroll

Expenses Direct Assigned to CGC
Credit & Collections MGT
Customer Logistics Services
Total Direct Assigned Payroll

Total Allocated from AGL Services Company During 2009

Net Increase in Cost due to in-sourcing

**Chattanooga Gas Company
Goodwill Advertising
For the Year Ended December 31, 2009**

Allocated		AGL Services Company Amount	
GL29	670750	Institution or Goodwill Adv. E	15,631
		Allocation percentage	3.15%
		Allocated Goodwill	493

Chattanooga Gas Company
Docket Number 09-00183
CAPD Question 1-46
Attachment 46-6

Chattanooga Gas Company
Outside Services-Meter Reader Expense
For the Year Ended December 31, 2009

Direct

GL8 650102 Meter Reading-Enscan-Contracto
GL8 650103 Meter Reading- Itron-Contracto
Total Direct Charges

129,808
129,808

Chattanooga Gas Company
Reflect Expense for Property Tax of Calendar Year 2009

Actual Property Tax Paid for 2009 for Property Owned in State of Tennessee	1,234,063	(1)
Property Tax Bills paid for out-of-State underground Storage for 2009	257,800	(1)
Property Tax Bills paid for 2009	32,648	(1)
Actual Property Tax Paid for 2009	<u>1,524,511</u>	
Less: Amount per income statement	1,689,674	
Reduction to accrued amounts to equal payments related to 2009	(165,163)	

(1) Please see response to CAPD Discovery Request Number 1-57.

Chattanooga Gas Company
PUHCA Tax Expense, non-recurring charges
For the Year Ended December 31, 2009

Allocated	
427600	PUHCA Tax Expense (73,531)
	Allocated PUHCA (73,531)

This is a tax allocation of tax amounts from the parent company per the tax allocation agreement. The allocation is comprised primarily of interest cost of the holding company and certain non-jurisdictional expenses recorded at the holding company. The amount is eliminated because the proper level of income tax benefit is recorded through interest synchronization and CGC should not be affected by non-jurisdictional items of the holding company.

Chattanooga Gas Company
AGL Services Company (AGSC) Allocated
For the Year Ended December 31, 2009

Total Allocated Costs to CGC from AGL Services Company (AGSC)	4,908,973
Divided By: AGSC Total Allocable Costs	155,733,884
Proportion of AGSC Expenses Allocated to CGC during test period	3.15%

Chattanooga Gas Company

Docket Number 09-00183

CAPD

Question 57

2/17/2010

1 of 1

DISCOVERY REQUEST NO. 57:

Provide copies of all ad valorem tax bills paid before March 1, 2009 and copies of all ad valorem tax bills to be paid before March 1, 2010.

Response:

Please refer to the first page of attachment 57-1 for a detail of the ad valorem tax bills for 2007, 2008 and 2009. The remainder of the pages are of the attachment are copies of the ad valorem tax bills. All information except page 1 is being filed under seal pending the issuance of a protective order in this docket.

Revised Response:

Attachment 57-2 is an addendum that provides copies of ad valorem tax bills for leases and natural gas stored that were inadvertently not originally filed in Attachment 57-1 for 2008 and 2009 as requested. Attachment 57-3 is an addendum that summarizes those bills.

15/2/2009
0107865
94
21 KNAPPEN
1260-6694
CK IS FOR

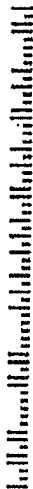
Personal Property Tax Notice

Tax Year 2009

ETURN SERVICE REQUESTED

CHATTANOOGA GAS COMPANY
PO BOX 4569
ATLANTA, GA 30302-4569

531/4



PPIN	3451 - 0	Description
Parcel Number		True Assessed
	.00	2274220 341133
True Value	2,274,220	INVENTORIES
Assessed Value	341133	
County Tax	21099.08	
School Tax	.00	
City Tax	.00	
	.00	
Net Advalorem Tax	21099.08	
TOTAL TAXES DUE	\$21,099.08	Due on or before February 1, 2010
TAX DISTRICT	4010	Delinquent at 1% per month after due date.

Keep this portion for your records

available To: JOHN E. BALLANCE, SHERIFF AND EX-OFFICIO TAX COLLECTOR, 2100006500 WARD W-1-OUT
BIENVILLE PARISH
PO BOX 428 ARCADIA, LA 71001

YOUR PARISH TAXES AS ITEMIZED ARE NOW DUE. TAXES BECOME DELINQUENT ON JANUARY 1ST, 1% INTEREST PER MONTH WILL BE ADDED FROM THAT DATE FORWARD. FOR ADDRESS CORRECTION CALL 318-263-2215 OR TO QUESTION ASSESSED VALUE OR HOMESTEAD EXEMPTION CALL 318-263-2214.

ASSESSED VALUE: 2,147,040 LESS HOMESTEAD: 0 TAXABLE: 2,147,040

PARCEL NUMBER: 2100006500

NATURAL GAS IN STORAGE AT BEAR CREEK STORAGE FACILITY. (EL PASO & S.N. CUSTOMER)

87.50M (01) PARISH WIDE TAX \$ 188,058.23
05.71M (20) N.B.P. FIRE \$ 12,258.58
00.00M (21) SCH. DIST. #1 0.00 \$ 0.00
03.28M (40) REC. DIST. #1 \$ 7,042.30
01.03M (41) HOSP. DIST. #2 \$ 2,211.45
06.00M HOSP. DIST. #2 6. \$ 12,882.24

PERSONAL MESSAGE

It is your responsibility to forward this notice or a copy of this notice to your Mortgage Company.

TAX YEAR 2009

KEEP THIS PORTION FOR YOUR RECORDS
THIS IS YOUR ONLY RECEIPT

30302\$4589 B010

TOTAL DUE \$ 722,454.81

ADDRESS
SERVICE
REQUESTED

TAX YEAR 2008

2100006500 WARD W-1-OUT

FIRST-CLASS MAIL
U.S. POSTAGE PAID
ARCADIA, LA
PERMIT NO. 50

RETURN THIS STUB WITH PAYMENT

87.50M (01) PARISH WIDE TAX \$ 188,058.23
05.71M (20) N.B.P. FIRE \$ 12,258.58
00.00M (21) SCH. DIST. #1 0.00M \$ 0.00
03.28M (40) REC. DIST. #1 \$ 7,042.30
01.03M (41) HOSP. DIST. #2 \$ 2,211.45
06.00M HOSP. DIST. #2 6.00M \$ 12,882.24

TOTAL DUE \$ 722,454.81

CHATTANOOGA GAS CO.
C/O AGL RESOURCES
P. O. BOX 4589 LOC 1150
ATLANTA GA 30302-4589

Chattanooga Gas Company
Docket No. 09-00183
Question No. 1-57
Attachment 57-2

30302\$4589 B010

Chattanooga Gas Company
Docket No. 09-00183
Question No. 1-57
Attachment 57-2

Dillard Partnership

2631 Rhea County Hwy.
Dayton, TN 37321
(423) 775-1793 fax (423) 775-2947

Invoice No. 1095

INVOICE

Customer

Name AGL Resources
Address 10 Peachtree Place NW Suite 1000 Location 1391
City Atlanta State GA ZIP 30309
Attn: Director of Facilities - Tracy Croker

Date 1/26/2010
Order No. _____
Rep Anne T. Dillard
FOB _____

Qty	Description	Unit Price	TOTAL
1	Re: 2207 Olan Mills Road Chattanooga, TN 37421-1891		
	2009 City of Chattanooga Property Tax	\$ 15,082.10	
	2009 Hamilton County Property Tax	\$17,566.00	
	Total of 2009 Property Taxes	\$32,648.10	\$32,648.10

Payment Details

- ☐ Cash
☒ Check
☐ Credit Card

Name _____
CC # _____
Expires _____

Subtotal	\$32,648.10
Shipping & Handling	\$0.00
Taxes State	
TOTAL	\$32,648.10

Office Use Only

**PLEASE MAKE CHECK PAYABLE TO
DILLARD PARTNERSHIP**

DUE & PAYABLE UPON RECEIPT

Carl E. Levi, Hamilton County Trustee

625 Georgia Avenue, Room 210

Chattanooga, TN 37402

Phone: (423) 209-7270

WWW.HamiltonTn.govTAXES ARE DUE **Chattanooga, Ga**

TAX BILL NO.

OCTOBER 1, 2009 Docket No. 2009016569

AND MUST BE PAID BY Question No. 1-57

FEBRUARY 28, 2010 Attachment 57-2

ADDRESS OF PROPERTY
2207 OLAN MILLS DR
TAXPAYER MAILING ADDRESS
DILLARD PARTNERSHIP ATTN ANNE DILLARD 2631 RHEA COUNTY HWY DAYTON, TN 37321

IF YOU HAVE A QUESTION REGARDING THE APPRAISAL OR ASSESSMENT OF THIS TAX NOTICE, YOU MAY CONTACT THE ASSESSOR OF PROPERTY AT (423) 209-7300.

HAMILTON COUNTY, TENNESSEE
Real Property Tax Notice**TAX YEAR****2009**

DESCRIPTION OF PROPERTY							NOTES
LT 2 SHALLOWFORD @ 153 BUSINES DEV SUB PB 69 PG 66 ER22147 PU13503 (N/C,ADJ VALUE)							
MORTGAGE CODE	DIST	MAP NO.	GP	CTL MAP	PARCEL	S. INT	
	1		B	1380	001.13		
TAX OR FEE		ASSESSMENT		TAX RATE		AMOUNT DUE	
Hamilton County Property Tax		\$635,240		2.7652		\$17,566.00	
May pay at any First Tennessee Bank in Hamilton County						TOTAL AMOUNT DUE	
						\$17,566.00	

CREDIT CARD - PAY ONLINE

(A 2.75% Convenience Fee will be assessed by the Financial Institution)

www.HamiltonTn.govYOUR CANCELLED CHECK IS YOUR RECEIPT**IF YOUR TAXES ARE PAID BY A MORTGAGE COMPANY, PLEASE FORWARD THIS NOTICE TO THEM.**OWNER:
DILLARD PARTNERSHIP

THIS STUB MUST BE RETURNED WITH YOUR PAYMENT

ADDRESS OF PROPERTY:
2207 OLAN MILLS DR

1380 B 001.13

**TAX YEAR****2009**

TAX BILL NO.	AMOUNT DUE
2009016569	\$17,566.00

YOUR CANCELLED CHECK IS YOUR RECEIPT. HOWEVER, IF YOU DESIRE A VALIDATED RECEIPT, PLEASE RETURN BOTH PORTIONS OF THIS TAX NOTICE WITH A **SELF-ADDRESSED STAMPED ENVELOPE**. PLEASE DO NOT MAIL CASH.

TO INSURE PROPER CREDIT, PLEASE WRITE YOUR BILL NUMBER ON YOUR CHECK

REQUEST FOR MAILING ADDRESS CHANGE	
NAME	_____
ADDRESS	_____
CITY & STATE	_____
ZIP	_____ PHONE NO. _____

MAKE YOUR CHECK PAYABLE TO:**Hamilton County Trustee**

P.O. Box 11047

Chattanooga, TN 37401



5505552009016569 06001756600N

Mail Payments Oct. - Feb. To:
Chattanooga City Treasurer
P.O. Box 191
Chattanooga, TN 37401-0191

City of Chattanooga
2009 Property Tax Statement

Due October 1, 2009
Delinquent March 1, 2010
Phone (423) 757-5191
Fax (423) 757-5566

Chattanooga Gas Company
Docket No. 000199
Question
Attachment

Gayle P. Keown
City Treasurer

If paying in person, bring both portions of this tax notice.

DILLARD PARTNERSHIP
ATTN ANNE DILLARD
2631 RHEA COUNTY HWY
DAYTON TN 37321

Bill Number 16569
Parcel ID 1380-B -001.13
Assessed Value \$ 635,240
Tax Rate 1.939
Mtg Code

2009 Current Charges

Real Property Tax \$12,317.30
Water Quality Fee * \$2,764.80

Total Due \$15,082.10
(if paid by cash or check)

Property Location

2207 OLAN MILLS DR

Description of Property

LT 2 SHALLOWFORD @ 153 BUSINES
DEV SUB PB 69 PG 66
ER22147 PU13503 (N/C,ADJ VALUE

*Water Quality Fee Questions: Call 311

PAYMENT OPTIONS:

- 2009 TAXES MAY BE PAID BY CHECK AT ANY FIRST TENNESSEE BANK CHATTANOOGA LOCATION UNTIL FEBRUARY 27, 2010. (Must bring both portions of this tax notice.)
- By mail at P.O. Box 191, Chattanooga, TN 37401-0191 (only Oct. - Feb.).
- Online using your credit card at <http://paypropertytax.chattanooga.gov> until June 30, 2010. See the reverse side for additional information concerning credit card payments.
- At our office location. (Must bring both portions of this tax notice.)
Room 100, City Hall, 101 E. 11th St., Chattanooga, TN 37402

Do not include additional correspondence with your P.O. Box payment.

✓ YOUR CANCELLED CHECK IS YOUR RECEIPT.

See Reverse Side for Treasurer's Remarks and Credit Card Payment Information

PLEASE DETACH AND RETURN LOWER PORTION WITH YOUR CHECK.
TO ENSURE PROPER CREDIT, PLEASE INCLUDE THE BILL NUMBER ON YOUR CHECK.

City of Chattanooga
2009 Remittance Advice

Tax Amount Due	\$12,317.30	Real Property Tax
Water Quality Fee Due	\$2,764.80	
Total Due	<u>\$15,082.10</u>	

Bill Number	16569
Parcel ID	1380-B -001.13
Assessed Value	\$ 635,240
Tax Rate	1.939
Location	2207 OLAN MILLS DR
Mtg Code	

Assessed Owner

DILLARD PARTNERSHIP
ATTN ANNE DILLARD
2631 RHEA COUNTY HWY
DAYTON TN 37321

Make check payable to:

CHATTANOOGA CITY TREASURER
PO BOX 191
CHATTANOOGA, TN 37401-0191

200900165690001508210N

Payable To: JOHN E. BALLANCE, SHERIFF AND EX-OFFICIO TAX COLLECTOR 2100008500 TAX NOTICE

PO BOX 328
ARCADIA, LA 71001

YOUR PARISH TAXES AS ITEMIZED ARE NOW DUE. TAXES BECOME DELINQUENT ON JANUARY 1ST, 1% INTEREST PER MONTH WILL BE ADDED FROM THAT DATE FORWARD. FOR ADDRESS CORRECTION CALL 318-263-2215 OR TO QUESTION ASSESSED VALUE OR HOMESTEAD EXEMPTION CALL 318-263-2214.

ASSESSED VALUE: 1,991,550 LESS HOMESTEAD: 0 TAXABLE: 1,991,550

DESCRIPTION OF PROPERTY

PARCEL NUMBER: 2100008500

NATURAL GAS IN STORAGE AT BEAR CREEK STORAGE FACILITY. (EL PASO & S.N. CUSTOMER)

58.87M (01) PARISH WID \$ 173,005.85
06.07M (20) N.B.P. FIRE \$ 12,088.71
00.00M (21) SCH. DIST. #1 0.00M \$ 0.00
03.28M (40) REC. DIST. #1 \$ 6,532.28
01.03M (41) HOSP. DIST. #2 \$ 2,051.29
06.00M HOSP. DIST. #2 0 \$ 11,848.30

PERSONAL MESSAGE

It is your responsibility to forward this notice or a copy of this notice to your Mortgage Company.

TOTAL DUE \$ 205,627.53

TAX YEAR 2008

KEEP THIS PORTION FOR YOUR RECORDS
THIS IS YOUR ONLY RECEIPT

30302#4569 3010

ADDRESS
SERVICE
REQUESTED

TAX YEAR 2008

TAX NOTICE# 2100008500

FIRST-CLASS MAIL
U.S. POSTAGE PAID
ARCADIA, LA
PERMIT NO. 50

58.87M (01) PARISH WIDE TAX \$ 173,005.85
06.07M (20) N.B.P. FIRE \$ 12,088.71
00.00M (21) SCH. DIST. #1 0.00M \$ 0.00
03.28M (40) REC. DIST. #1 \$ 6,532.28
01.03M (41) HOSP. DIST. #2 \$ 2,051.29
06.00M HOSP. DIST. #2 0.00M \$ 11,848.30
STUB WITH PAYMENT

TOTAL DUE \$ 205,627.53

CHATTANOOGA GAS CO.
C/O ATLANTA GAS LIGHT CO.
P. O. BOX 4569 LOC 1150
ATLANTA GA 30302-4569

Chattanooga Gas Company
Docket No. 09-00183
Question No. 1-57
Attachment 57-2

30302#4569 3010

Mail Payments To:
Chattanooga City Treasurer
P.O. Box 191
Chattanooga, TN 37401-0191
(Oct. - Feb.)

**City of Chattanooga
2008 Property Tax Statement**

Due October 1, 2008
Delinquent March 1, 2009
Phone (423) 757-5191
Fax (423) 757-5566

Chattanooga Gas
Docket No.
Question
Attachment 2



Gayle P. Keown
City Treasurer

If paying in person, bring both portions of this tax notice.

DILLARD PARTNERSHIP
ATTN ANNE DILLARD
2631 RHEA COUNTY HWY
DAYTON TN 37321

Bill Number 16394
Parcel ID 1380 -B -001.13
Assessed Value \$ 544,080
Tax Rate 2.202
Mtg Code

2008 Current Charges

Real Property Tax \$11,980.64
Water Quality Fee * \$1,123.22

Total Due \$13,103.86
(If paid by cash or check)

Property Location

2207 OLAN MILLS DR

Description of Property

LT 2 SHALLOWFORD @ 153 BUSINES
DEV SUB PB 69 PG 66
ER22147 PU13503 (N/C,ADJ VALUE)

PAYMENT OPTIONS:

- 2008 TAXES MAY BE PAID BY CHECK OR CASH AT ANY FIRST TENNESSEE BANK CHATTANOOGA LOCATION UNTIL FEBRUARY 28, 2009. (Must bring both portions of this tax notice.)
- By mail at P.O. Box 191, Chattanooga, TN 37401-0191.
- Online using your credit card at <http://paypropertytax.chattanooga.gov> until June 30, 2009. See the reverse side for additional information concerning credit card payments.
- At our office location. (Must bring both portions of this tax notice.)
Room 100, City Hall, 101 E. 11th Street, Chattanooga, TN 37402

Do not include additional correspondence with your P.O. Box payment.

✓ YOUR CANCELLED CHECK IS YOUR RECEIPT.

See Reverse Side for Treasurer's Remarks and Credit Card Payment Information

PLEASE DETACH AND RETURN LOWER PORTION WITH YOUR CHECK.
TO ENSURE PROPER CREDIT, PLEASE INCLUDE THE BILL NUMBER ON YOUR CHECK.

Tax Amount Due \$11,980.64
Water Quality Fee Due \$1,123.22

Total Due \$13,103.86

**City of Chattanooga
2008 Remittance Advice**

Real Estate Tax

Bill Number 16394
Parcel ID 1380 -B -001.13
Assessed Value \$ 544,080
Tax Rate 2.202
Location 2207 OLAN MILLS DR
Mtg Code

Assessed Owner

DILLARD PARTNERSHIP
ATTN ANNE DILLARD
2631 RHEA COUNTY HWY
DAYTON TN 37321

Make check payable to:

CHATTANOOGA CITY TREASURER
P.O. BOX 191
CHATTANOOGA, TN 37401-0191

200800163940001310386N

Carl E. Levi, Hamilton County Trustee625 Georgia Avenue, Room 210
Chattanooga, TN 37402

Phone: (423) 209-7270

WWW.HamiltonTn.gov

TAXES ARE DUE AND PAYABLE ON

OCTOBER 1, 2008

AND MUST BE PAID BY

FEBRUARY 28, 2009

Chattanooga, GA

Docket No.

Question No. 1-57

Attachment 37-2

TAX BILL NO.**2008016395****ADDRESS OF PROPERTY****2207 OLAN MILLS DR****TAXPAYER MAILING ADDRESS**DILLARD PARTNERSHIP
ATTN ANNE DILLARD
2631 RHEA COUNTY HWY
DAYTON, TN 37321IF YOU HAVE A QUESTION REGARDING THE APPRAISAL OR
ASSESSMENT OF THIS TAX NOTICE, YOU MAY CONTACT THE
ASSESSOR OF PROPERTY AT (423) 209-7300.**HAMILTON COUNTY, TENNESSEE
Real Property Tax Notice****TAX YEAR****2008****DESCRIPTION OF PROPERTY****NOTES**LT 2 SHALLOWFORD @ 153 BUSINES
DEV SUB PB 69.PG 66
ER22147 PL13503 (N/C ADJ L & LIE**MORTGAGE CODE****DIST****MAP NO.****GP****CTL MAP****PARCEL****S. INT****1****B****1380****001.13****TAX OR FEE****ASSESSMENT****TAX RATE****AMOUNT DUE**

Hamilton County Property Tax

\$544,080**3.1540****\$17,160.00****May pay at any First Tennessee Bank in Hamilton County****TOTAL AMOUNT DUE****\$17,160.00****CREDIT CARD - PAY ONLINE**

(A 2.75% Convenience Fee will be assessed by the Financial Institution)

www.HamiltonTn.gov**YOUR CANCELLED CHECK IS YOUR RECEIPT****IF YOUR TAXES ARE PAID BY A MORTGAGE COMPANY, PLEASE FORWARD THIS NOTICE TO THEM.**

OWNER:

THIS STUB MUST BE RETURNED WITH YOUR PAYMENTDILLARD PARTNERSHIP
ADDRESS OF PROPERTY:**2207 OLAN MILLS DR****TAX BILL NO.****2008016395****AMOUNT DUE****\$17,160.00****REQUEST FOR MAILING ADDRESS CHANGE**

NAME _____

ADDRESS _____

CITY & STATE _____

ZIP _____ PHONE NO. _____

**TAX YEAR****2008****1380 B 001.13****YOUR CANCELLED CHECK IS YOUR RECEIPT. HOWEVER, IF YOU DESIRE A
VALIDATED RECEIPT, PLEASE RETURN BOTH PORTIONS OF THIS TAX NOTICE
WITH A SELF-ADDRESSED STAMPED ENVELOPE****PLEASE DO NOT MAIL CASH.****TO INSURE PROPER CREDIT, PLEASE WRITE YOUR BILL NUMBER ON YOUR CHECK****MAKE YOUR CHECK PAYABLE TO:****Hamilton County Trustee****P.O. Box 11047****Chattanooga, TN 37401****5505552008016395 060017160000**

**Chattanooga Gas Company
Storage Gas and Leased Property Taxes**

County	Billing Tax District	Tax Location (Short)	Jurisdiction	2008 Actual bill - Leased Property	2008 Actual bill - Storage Gas
Monroe Co (MS)	Monroe Co.	Monroe	Monroe County		(1)
Monroe Co (MS)	City of Aberdeen	Aberdeen	City of Aberdeen		(1)
Bienville Parish (LA)	Bienville Parish	Bienville	Bienville Parish		205,628
Hamilton Co	City of Chattanooga	Chattanooga	City of Chattanooga	13,104	
Hamilton Co	Hamilton Co	Hamilton	Hamilton County	17,160	
	Total			30,264	205,628
County	Billing Tax District	Tax Location (Short)	Jurisdiction	2009 Actual bill - Leased Property	2009 Actual bill - Storage Gas
Monroe Co (MS)	Monroe Co.	Monroe	Monroe County		21,099
Monroe Co (MS)	City of Aberdeen	Aberdeen	City of Aberdeen		14,246
Bienville Parish (LA)	Bienville Parish	Bienville	Bienville Parish		222,455
Hamilton Co	City of Chattanooga	Chattanooga	City of Chattanooga	15,082	
Hamilton Co	Hamilton Co	Hamilton	Hamilton County	17,566	
	Total			32,648	257,800

(1) There was no tax in these jurisdictions for 2008.

DISCOVERY REQUEST NO. 138:

For purposes of this request, please refer to page 6, lines 3 through 4 of Mr. Lindsey's Direct Testimony. Please provide on an annual basis, for the last five years, the portion of the costs recovered through fixed and variable charges/revenues. Please provide this information in electronic spreadsheet format and all calculations, estimated, and formulae used to generate the estimates. Provide workpapers supporting this response in electronic spreadsheet form, with all links and formulas intact, source data used, and explain all assumptions and calculations used. To the extent the data requested is not available in the form requested, please provide the information in the form that most closely matches what has been requested.

Response:

Please see attachment 138-1.

Chattanooga Gas Company

Base Margin Revenue by Type of Charge

	2005*	2006	2007	2008	2009
Base Customer Revenue					
Customer	\$ 6,509,064	\$ 6,803,130	\$ 10,589,205	\$ 10,994,487	\$ 11,019,394
Demand	\$ -	\$ 449,625	\$ 2,659,628	\$ 2,939,717	\$ 2,862,398
Capacity	\$ -	\$ -	\$ 291,609	\$ 296,585	\$ 342,270
Variable	\$ 16,763,060	\$ 20,391,625	\$ 15,779,575	\$ 15,922,779	\$ 15,226,056
WNA	\$ 1,337,010	\$ 1,117,938	\$ 1,573,754	\$ 264,298	\$ 559,116
Total Base Customer Revenue	\$ 24,609,135	\$ 28,762,318	\$ 30,893,769	\$ 30,417,866	\$ 30,009,234
Miscellaneous	\$ 934,336	\$ 967,740	\$ 765,235	\$ 901,623	\$ 719,205
Total Base Margin Revenue	\$ 25,543,471	\$ 29,730,058	\$ 31,659,005	\$ 31,319,489	\$ 30,728,439
Fixed Charges	\$ 6,509,064	\$ 7,252,755	\$ 13,540,441	\$ 14,230,789	\$ 14,224,062
Variable Charges	\$ 18,100,071	\$ 21,509,563	\$ 17,353,328	\$ 16,187,077	\$ 15,785,172
Miscellaneous	\$ 934,336	\$ 967,740	\$ 765,235	\$ 901,623	\$ 719,205
Total Base Margin Revenue	\$ 25,543,471	\$ 29,730,058	\$ 31,659,005	\$ 31,319,489	\$ 30,728,439
Percentage Recovery					
Fixed Charges	25%	24%	43%	45%	46%
Variable Charges	71%	72%	55%	52%	51%
Miscellaneous	4%	3%	2%	3%	2%
Total Base Margin Revenue	100%	100%	100%	100%	100%

* 2005 Contains only Residential and Small Commercial Data. Large commercial and Industrial detailed data not available

Chattanooga Gas Company

Docket Number 09-00183

CAPD

Question 193

2/17/2010

1 of 1

DISCOVERY REQUEST NO. 193:

Please provide the base revenue for each current and proposed rate class for each of the calendar years 1999 through 2009 and as projected by rate class for 2010 and 2011. Please provide workpapers in electronic spreadsheet form, with all links and formulas intact, source data used, and explain all assumptions and calculations used. To the extent the data requested is not available in the form requested, please provide the information in the form that most closely matches what has been requested.

Response:

Please see Attachment 193-1 for yearly Base Revenues by customer class for 2000 projected through 2011. Data is not available in the format requested prior to 2000.

Chattanooga Gas

Base Revenues

Chattanooga Gas Company
Docket Number 09-00183
CAPD Question 1-193
Attachment 193-1
1 of 1

Residential R-1

2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	Projected 2010	Projected 2011
\$11,670,960	\$12,149,091	\$11,946,119	\$12,125,002	\$12,030,781	\$12,522,767	\$12,259,627	\$12,987,360	\$13,570,937	\$13,334,599	\$13,437,530	\$13,472,460

Residential R-4

Data not available prior to January 2002

2002	2003	2004	2005	2006	2007	2008	2009	Projected 2010	Projected 2011
\$63,812	\$39,636	\$35,951	\$27,882	\$32,286	\$30,694	\$31,918	\$29,647	\$30,744	\$30,744

Commercial C-1

2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	Projected 2010	Projected 2011
\$10,595,077	\$11,317,786	\$10,370,879	\$10,655,201	\$10,459,530	\$10,721,475	\$10,849,838	\$4,513,114	\$3,458,227	\$3,421,855	\$3,567,325	\$3,474,271

Commercial C-2

Class was established in January 2007

2007	2008	2009	Projected 2010	Projected 2011
\$6,874,566	\$7,851,581	\$7,295,613	\$6,844,524	\$6,702,524

Industrial F-1/T-2

Formerly I-1/T-2

Data not available prior to January 2006

2006	2007	2008	2009	Projected 2010	Projected 2011
\$2,551,123	\$1,694,924	\$1,793,666	\$1,704,866	\$1,687,077	\$1,733,842

Special Contract

Data not available prior to January 2006

2006	2007	2008	2009	Projected 2010	Projected 2011
\$69,252	\$71,323	\$67,209	\$63,646	\$137,544	\$137,544

Industrial F-1/T-2 + T-1

Formerly I-1/T-2 + T-1

Data not available in this format prior to January 2007

2006	2007	2008	2009	Projected 2010	Projected 2011
*Included in F-1/T-2 Revenues	\$985,371	\$1,006,909	\$1,033,815	\$895,572	\$895,572

Industrial I-1

Formerly L-1

Data not available in this format prior to January 2007

2006	2007	2008	2009	Projected 2010	Projected 2011
*Included in T-1 Revenues	\$39,813	\$42,640	\$39,320	\$37,991	\$37,991

Industrial T-1

Includes SS-1 Total Revenues

Data not available prior to January 2006

2006	2007	2008	2009	Projected 2010	Projected 2011
\$1,744,409	\$1,922,850	\$1,722,206	\$1,803,629	\$1,527,784	\$1,515,106

*Includes I-1 Revenues

Industrial T-3

Data not available prior to January 2006

2006	2007	2008	2009	Projected 2010	Projected 2011
\$137,845	\$218,260	\$608,276	\$723,129	\$712,235	\$712,235

Chattanooga Gas Company

Docket Number 09-00183

CAPD

Question 194

2/17/2010

1 of 1

DISCOVERY REQUEST NO. 194:

Please provide the total revenue, broken down by major category, for each current and proposed rate class for each of the calendar years 1999 through 2009 and as projected by rate class for 2010 and 2011. Please provide workpapers in electronic spreadsheet form, with all links and formulas intact, source data used, and explain all assumptions and calculations used. To the extent the data requested is not available in the form requested, please provide the information in the form that most closely matches what has been requested.

Response:

Please see Attachment 194-1 for yearly Total Revenues by customer class for 2000 projected through 2011. Data is not available in the format requested prior to 2000.

Chattanooga Gas

Total Revenues

Chattanooga Gas Company
Docket Number 09-00183
CAPD Question 1-194
Attachment 194-1
1 of 1

Residential R-1

2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	Projected 2010	Projected 2011
\$32,800,893	\$40,477,609	\$33,616,153	\$41,265,053	\$40,019,646	\$47,935,324	\$53,873,324	\$44,908,258	\$49,400,538	\$43,040,072	\$42,266,430	\$44,166,860

Residential R-4

2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	Projected 2010	Projected 2011
\$250,397	\$290,991	\$231,432	\$130,452	\$116,230	\$91,892	\$130,891	\$105,793	\$120,664	\$94,470	\$97,582	\$104,659

Commercial C-1

2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	Projected 2010	Projected 2011
\$31,546,713	\$40,031,094	\$32,588,526	\$40,396,163	\$38,787,837	\$45,809,293	\$53,194,224	\$14,769,724	\$10,736,540	\$9,678,745	\$10,145,925	\$10,532,271

Commercial C-2

Class was established in January 2007

2007	2008	2009	Projected 2010	Projected 2011
\$26,658,564	\$34,003,317	\$26,398,430	\$24,714,424	\$25,868,631

Industrial F-1/T-2

Formerly I-1/T-2

Data not available prior to January 2006

2006	2007	2008	2009	Projected 2010	Projected 2011
\$6,431,621	\$4,897,829	\$11,888,155	\$3,297,365	\$2,484,528	\$2,531,292

Special Contract

Data not available prior to January 2006

2006	2007	2008	2009	Projected 2010	Projected 2011
\$99,782	\$94,032	\$132,487	\$79,028	\$138,613	\$138,613

Industrial F-1/T-2 + T-1

Formerly I-1/T-2 + T-1

Data not available in this format prior to January 2007

2006	2007	2008	2009	Projected 2010	Projected 2011
	\$2,080,888	\$4,355,462	\$1,481,165	\$1,191,126	\$1,191,126

*Included in F-1/T-2 Revenues

Industrial I-1

Formerly L-1

Data not available in this format prior to January 2007

2006	2007	2008	2009	Projected 2010	Projected 2011
	\$459,734	\$600,795	\$312,216	\$417,654	\$449,050

*Included in T-1 Revenues

Industrial T-1

Includes SS-1 Total Revenues

Data not available prior to January 2006

2006	2007	2008	2009	Projected 2010	Projected 2011
\$2,257,097	\$2,068,317	\$2,194,882	\$1,962,840	\$1,793,125	\$1,780,448

*Includes I-1 Revenues

Industrial T-3

Data not available prior to January 2006

2006	2007	2008	2009	Projected 2010	Projected 2011
\$138,525	\$258,091	\$1,816,380	\$992,835	\$944,678	\$968,664

	Jan-09	Feb-09	Mar-09	Apr-09	May-09	Jun-09	Jul-09	Aug-09	Sep-09	Oct-09	Nov-09	Dec-09	Total Year 2009
670513 ATPI Capitalized	-	-	(3,416)	-	-	(2,570)	-	-	(2,432)	-	-	-	(8,418)
670150 AdminandGen Salaries-Capitalized	(3,433)	(1,952)	(1,479)	(2,720)	(3,043)	(2,919)	(3,111)	(3,270)	(1,842)	(3,896)	(3,451)	(4,841)	(35,957)
Total	(3,433)	(1,952)	(4,895)	(2,720)	(3,043)	(5,489)	(3,111)	(3,270)	(4,273)	(3,896)	(3,451)	(4,841)	(44,375)

**Rate Base - Pension and OPEB
Estimated Attrition Period Balance**

	Opening Balance	Expense	Notes Paygo	Notes	Ending Balance	Notes	Accumulated Deferred Income Tax		
							Federal	State	Total
Dec-07 Actual					(130,137)	(1)			
Jan-08	(130,137)	(12,431)	26,102		(116,466)				
Feb-08	(116,466)	7,519	34,958		(73,989)				
Mar-08	(73,989)	7,519	22,533		(43,937)				
Apr-08	(43,937)	29,239	11,150		(3,548)				
May-08	(3,548)	7,519	29,021		32,992				
Jun-08	32,992	7,519	14,441		54,953				
Jul-08	54,953	7,519	27,765		90,237				
Aug-08	90,237	7,519	62,946		160,701				
Sep-08	160,701	(141,890)	21,695		40,507				
Oct-08	40,507	(9,082)	18,550		49,975				
Nov-08	49,975	(9,082)	19,450		60,343				
Dec-08	60,343	(9,082)	39,545		90,809	(2)			
Jan-09	90,809	(16,067)	10,886		85,628				
Feb-09	85,628	(16,067)	27,387		96,948				
Mar-09	96,948	(16,067)	17,299		98,179				
Apr-09	98,179	(16,067)	14,313		96,425				
May-09	96,425	(16,067)	32,224		112,582				
Jun-09	112,582	(16,067)	21,083		117,598		(38,484)	(7,644)	(46,128)
Jul-09	117,598	(16,067)	20,180		121,710		(39,830)	(7,911)	(47,741)
Aug-09	121,710	(16,067)	10,120		115,763		(37,884)	(7,525)	(45,408)
Sep-09	115,763	4,642	29,560		149,965		(49,076)	(9,748)	(58,824)
Oct-09	149,965	(14,625)	6,208		141,548		(46,322)	(9,201)	(55,522)
Nov-09	141,548	(14,625)	10,554		137,477		(44,989)	(8,936)	(53,925)
Dec-09	137,477	(14,625)	17,924		140,775	(6)	(46,069)	(9,150)	(55,219)
Jan-10 Estimated	140,775	(9,516)	(4)	20,080	(7)	151,340	(49,526)	(9,837)	(59,363)
Feb-10	151,340	(9,516)	(4)	20,080	(7)	161,904	(52,983)	(10,524)	(63,507)
Mar-10	161,904	(9,516)	(4)	20,080	(7)	172,469	(56,440)	(11,210)	(67,651)
Apr-10	172,469	(9,516)	(4)	20,080	(7)	183,033	(59,898)	(11,897)	(71,795)
May-10	183,033	(9,516)	(4)	20,080	(7)	193,597	(63,355)	(12,584)	(75,939)
Jun-10	193,597	(9,516)	(4)	20,080	(7)	204,162	(66,812)	(13,271)	(80,082)
Jul-10	204,162	(9,516)	(4)	20,080	(7)	214,726	(70,269)	(13,957)	(84,226)
Aug-10	214,726	(9,516)	(4)	20,080	(7)	225,291	(73,726)	(14,644)	(88,370)
Sep-10	225,291	(9,516)	(4)	20,080	(7)	235,855	(77,184)	(15,331)	(92,514)
Oct-10	235,855	(9,516)	(4)	20,080	(7)	246,419	(80,641)	(16,017)	(96,658)
Nov-10	246,419	(9,516)	(4)	20,080	(7)	256,984	(84,098)	(16,704)	(100,802)
Dec-10	256,984	(9,516)	(4)	20,080	(7)	267,548	(87,555)	(17,391)	(104,946)
Jan-11	267,548	(6,788)	(5)	20,058	(8)	280,818	(91,898)	(18,253)	(110,151)
Feb-11	280,818	(6,788)	(5)	20,058	(8)	294,088	(96,240)	(19,116)	(115,356)
Mar-11	294,088	(6,788)	(5)	20,058	(8)	307,358	(100,583)	(19,978)	(120,561)
Apr-11	307,358	(6,788)	(5)	20,058	(8)	320,628	(104,926)	(20,841)	(125,766)
Test Period 13 Month Average: June 2008-June 2009					88,837		(29,072)	(5,774)	(34,846)
13 Month Average: December 2008-December 2009					115,800				
Attrition Period 13 Month Average: April 2010-April 2011					248,501				

(1) From Actuarial Letter from Mercer dated February 4, 2008 included in TRA FG Item 50-7. See page titled "AGL Resources Inc. Postretirement Health and Welfare Plans."

(2) From Actuarial Letter from Mercer dated January 28, 2009 included in TRA FG Item 50-8. See page titled "AGL Resources Inc. Postretirement Health and Welfare Plans".

(3) From Actuarial Letter from Mercer dated September 8, 2009 included in TRA FG Item 50-3. See Exhibit II.

(4) From Actuarial Letter from Mercer dated September 8, 2009 included in TRA FG Item 50-3. See Exhibit IV.

(5) From Actuarial Letter from Mercer dated September 8, 2009 included in TRA FG Item 50-5. See Exhibit II.

(6) From Actuarial Letter from Mercer dated January 29, 2010 included in Discovery Request No 50 as attachment.

(7) From Actuarial Letter from Mercer dated September 8, 2009 included in TRA FG Item 50-5. See Exhibit III. Estimated Paygo of \$240,959 divided by 12.

(8) From Actuarial Letter from Mercer dated September 8, 2009 included in TRA FG Item 50-5. See Exhibit III. Estimated Paygo of \$240,700 divided by 12.