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April 9, 2010

### VIA EMAIL AND HAND DELIVERY

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 ("Company") is hereby supplementing its discovery responses and is providing certain information requested by the Consumer Advocate and Protection Division ("CAPD").

CGC is providing its response to discovery request no. 15 from the CAPD's second set of discovery requests. Additionally, CGC is supplementing its response to No. 165 of the CAPD's first set of discovery requests by providing Confidential Attachment 165-3 under seal pursuant to the Agreed Protective Order entered in this docket. Finally, the CAPD has requested a copy of the report referenced on page 18 of Mr. Yardley's rebuttal testimony, and CGC is providing a copy of this report on the enclosed CD.

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

Sincerely,

Jamy J. Mundij Jennifer L. Brundige

filed electronically in docket office on 04/09/10

### Enclosures

cc:

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

Chattanooga Gas Company Docket No. 09-00183 CAPD-2 Question 15 4/9/2010

## **DISCOVERY REQUEST NO. 15:**

In its first discovery requests in this case, the Consumer Advocate asked the following question:

**REQUEST NO. 201** Admit or Deny: Capacity Demand Costs of Chattanooga Gas Company are sold directly or indirectly through Sequent Energy Management to SouthStar Energy Services, an AGL Resources subsidiary. For purposes of this and the following interrogatory only, "Capacity Demand Costs" shall be defined as gas commodity costs, interstate pipeline capacity, or any other costs associated with the gas supply plan of Chattanooga Gas Company.

If Denied, please describe what specific portions of the preceding are denied and why they are inaccurate.

Please provide the names of the person or persons who answered, supplied information, or were consulted with by CGC in responding to this request No. 201, and state the nature of the answer, information, or consultation provided.

# **Response:**

The objections raised by the Company in its filing on March 18, 2010 are incorporated herein by reference. Without waiving these objections, Archie Hickerson answered this discovery request on behalf of the Company.