

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

**IN RE:** )  
 )  
**PETITION OF CHATTANOOGA GAS** )  
**COMPANY FOR APPROVAL OF ITS** )  
**RATES AND CHARGES, MODIFICATION** ) **DOCKET NO. 09-00183**  
**OF ITS RATE DESIGN, AND REVISED** )  
**TARIFF** )

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**DISCOVERY REQUEST OF THE CONSUMER ADVOCATE TO CHATTANOOGA  
GAS COMPANY**

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**To: Chattanooga Gas Company  
c/o J. W. Luna, Esq.  
Jennifer L. Brundige, Esq.  
Luna Law Group, PLLC  
333 Union Street, Suite 300  
Nashville, TN 37201**

This Discovery Request is hereby served upon Chattanooga Gas Company ("CGC," or "Company"), pursuant to Rules 26, 33, 34 and 36 of the Tennessee Rules of Civil Procedure and Tenn. Comp. R. & Reg. 1220-1-2-.11. We request that full and complete responses be provided pursuant to the Tennessee Rules of Civil Procedure. The responses are to be produced at the Office of the Tennessee Attorney General and Reporter, Consumer Advocate and Protection Division, 425 Fifth Avenue North, Nashville, Tennessee 37243, c/o C. Scott Jackson on or before February 5, 2010.

**PRELIMINARY MATTERS AND DEFINITIONS**

Each discovery request calls for all knowledge, information and material available to Company, as a party, whether it be the Company's, in particular, or knowledge, information or material possessed or available to Company's attorney or other representative.

These discovery requests are to be considered continuing in nature, and are to be supplemented from time to time as information is received by CGC which would make a prior

response inaccurate, incomplete, or incorrect. In addition, the Consumer Advocate and Protection Division of the Tennessee Attorney General (“Attorney General” or “Consumer Advocate”) requests that CGC supplement responses hereto with respect to any question directly addressed to the identity and location of persons having knowledge of discoverable matters, and the identity of each person expected to be called as an expert at hearing, the subject matter on which the expert is expected to testify, and the substance of the expert’s testimony.

These discovery requests are to be interpreted broadly to fulfill the benefit of full discovery. The singular of any discovery request includes the plural and the plural includes the singular. To assist you in providing full and complete discovery, the Attorney General provides the following definitional guidelines.

The terms “and” and “or” shall be construed conjunctively or disjunctively as necessary to include any information that might otherwise be construed outside the scope of these requests.

The term “communication” means any transmission of information by oral, graphic, pictorial or otherwise perceptible means, including but not limited to personal conversations, telephone conversations, letters, memoranda, telegrams, electronic mail, newsletters, recorded or handwritten messages, or otherwise.

For purposes of these discovery requests, the term “you” shall mean and include: CGC and all employees, agents and representatives thereof.

The term “person” or “persons” as used herein refers to any natural person, corporation, firm, company, sole proprietorship, partnership, business, unincorporated association, or other entity of any sort whatsoever. Where a company or organization is the party being served, all responses must include the company’s response. Moreover, the company’s designated person for responding must assure that the company provides complete answers. *A complete answer*

*must provide a response which includes all matters known or reasonably available to the Company.*

The term "identity" and "identify" as used herein, with respect to any person, means to provide their name, date of birth, current residence address, current residence telephone number, current business address, current business telephone number, and the occupation or job title of that person; with respect to an entity, those terms mean to provide the name by which said entity is commonly known, the current address of its principal place of business, and the nature of business currently conducted by that entity; with respect to any document, those terms mean to provide the date of the document, the nature of the document, the title of the document, the reference number (if any) of the document, and the current location of the document, including the identity of the person or entity in possession of the document.

The term "document" as used herein, means any medium upon which intelligence or information can be recorded or retrieved, such as any written, printed, typed, drawn, filmed, taped, or recorded medium in any manner, however produced or reproduced, including but not limited to any writing, drawing, graph, chart, form, workpaper, spreadsheet, e-mail, note, photograph, tape recording, computer disk or record, or other data compilation in any form without limitation. Produce the original and each copy, regardless of origin or location, of any book, pamphlet, periodical, letter, note, report, memorandum (including memoranda, note or report of a meeting or conversation), spreadsheet, photograph, videotape, audio tape, computer disk, e-mail, or any other written, typed, reported, transcribed, punched, taped, filmed, or graphic matter, however produced or reproduced, which is in your possession, custody or control or which was, but is no longer, in your possession, custody, or control. If any such document was, but no longer is, in your possession or control, state what disposition was made of it and when. If a document exists in different versions, including any dissimilar copies (such as a duplicate

with handwritten notes on one copy), each version shall be treated as a different document and each must be identified and produced.

If you produce documents in response to these discovery requests, produce the original of each document or, in the alternative, produce a copy of each document and identify the location of the original document. If the "original" document is itself a copy, that copy should be produced as the original.

If any objections are raised on the basis of privilege or immunity, include in your response a complete explanation concerning the privilege asserted.

If you contend that you are entitled to refuse to fully answer any of this discovery, state the exact legal basis for each such refusal.

If any of the interrogatories are not answered on the basis of privilege or immunity, include in your response to each such interrogatory a written statement evidencing:

- (a) the nature of the communication;
- (b) the date of the communication;
- (c) the identity of the persons present at such communication; and
- (d) a brief description of the communication sufficient to allow the Authority to rule on a motion to compel.

If, for any reason, you are unable to answer a discovery request fully, submit as much information as is available and explain why your answer is incomplete. If precise information cannot be supplied, submit 1) your best estimate, so identified, and your basis for the estimate and 2) such information available to you as comes closest to providing the information requested. If you have reason to believe that other sources of more complete and accurate information exist, identify those sources.

If any information requested is not furnished as requested, state where and how the information may be obtained or extracted, the person or persons having knowledge of the procedure and the person instructing that the information be excluded.

### **DISCOVERY REQUESTS**

#### **REQUEST NO. 1:**

Please provide Marcie Shields' exhibits from her testimony in excel format.

#### **RESPONSE:**

#### **REQUEST NO. 2:**

Please provide Dan Yardley's exhibits from his testimony in excel format.

#### **RESPONSE:**

#### **REQUEST NO. 3:**

Provide the number of residential customers for rate schedule R-1 by month for years 2004-2009 in excel format.

#### **RESPONSE:**

#### **REQUEST NO. 4**

Provide the number of residential therms for rate schedule R-1 by the first 25 therms per month, next 25 therms per month, and over 50 therms per month by month for years 2004-2009 in excel format.

#### **RESPONSE:**

**REQUEST NO. 5**

Provide the number of residential customers for rate schedule R-4 by month for years 2004-2009 in excel format.

**RESPONSE:**

**REQUEST NO. 6**

Provide the number of residential therms for rate schedule R-4 by month for years 2004-2009 in excel format.

**RESPONSE:**

**REQUEST NO. 7**

Provide the number of commercial customers for rate schedule C-1 by month for years 2004-2009 in excel format.

**RESPONSE:**

**REQUEST NO. 8**

Provide the number of commercial therms for rate schedule C-1 by month for years 2004-2009 in excel format.

**RESPONSE:**

**REQUEST NO. 9**

Provide the number of commercial customers for rate schedule C-2 by month for years 2004-2009 in excel format.

**RESPONSE:**

**REQUEST NO. 10**

Provide the number of commercial therms for rate schedule C-2 by the first 3,000 therms per month, next 2,000 therms per month, over 10,000 therms per month, and over 15,000 therms per month by month for years 2004-2009 in excel format.

**RESPONSE:**

**REQUEST NO. 11**

Provide the number of commercial therms, subject to demand charges, for rate schedule C-2 by month for years 2004-2009 in excel format.

**RESPONSE:**

**REQUEST NO. 12**

Provide the number of commercial customers for rate schedule F-1 by month for years 2004-2009 in excel format.

**RESPONSE:**

**REQUEST NO. 13**

Provide the number of commercial therms for rate schedule F-1 by the first 1,500 therms per month, next 2,500 therms per month, next 11,000 therms per month, and over 15,000 therms per month by month for years 2004-2009 in excel format.

**RESPONSE:**

**REQUEST NO. 14**

Provide the number of commercial therms, subject to demand charges, for rate schedule F-1 by month for years 2004-2009 in excel format.

**RESPONSE:**

**REQUEST NO. 15**

Provide the number of commercial customers for rate schedule I-1 by month for years 2004-2009 in excel format.

**RESPONSE:**

**REQUEST NO. 16**

Provide the number of commercial therms for rate schedule I-1 by the first 1,500 therms per month, next 2,500 therms per month, next 11,000 therms per month, and over 15,000 therms per month by month for years 2004-2009 in excel format.

**RESPONSE:**

**REQUEST NO. 17**

Provide the number of commercial therms, subject to demand charges, for rate schedule I-1 by month for years 2004-2009 in excel format.

**RESPONSE:**



**REQUEST NO. 18**

Provide the number of transportation customers for rate schedule T-1 by month for years 2004-2009 in excel format.

**RESPONSE:**

**REQUEST NO. 19**

Provide the number of transportation therms for rate schedule T-1 by the first 1,500 therms per month, next 2,500 therms per month, next 11,000 therms per month, and over 15,000 therms per month by month for years 2004-2009 in excel format.

**RESPONSE:**

**REQUEST NO. 20**

Provide the number of transportation therms, subject to demand charges, for rate schedule T-1 by month for years 2004-2009 in excel format.

**RESPONSE:**

**REQUEST NO. 21**

Provide the number of transportation customers for rate schedule T-2 by month for years 2004-2009 in excel format.

**RESPONSE:**

**REQUEST NO. 22**

Provide the number of transportation therms for rate schedule T-2 by the first 1,500 therms per month, next 2,500 therms per month, next 11,000 therms per month, and over 15,000 therms per month by month for years 2004-2009 in excel format.

**RESPONSE:**

**REQUEST NO. 23**

Provide the number of transportation therms, subject to demand charges, for rate schedule T-2 by month for years 2004-2009 in excel format.

**RESPONSE:**

**REQUEST NO. 24**

Provide the number of transportation customers for rate schedule T-3 by month for years 2004-2009 in excel format.

**RESPONSE:**

**REQUEST NO. 25**

Provide the number of transportation therms for rate schedule T-3 by the first 1,500 therms per month, next 2,500 therms per month, next 11,000 therms per month, and over 15,000 therms per month by month for years 2004-2009 in excel format.

**RESPONSE:**

**REQUEST NO. 26**

Provide the number of transportation therms, subject to demand charges, for rate schedule T-3 by month for years 2004-2009 in excel format.

**RESPONSE:**

**REQUEST NO. 27**

Provide the number of special contracts by customer by month for years 2004-2009 in excel format.

**RESPONSE:**

**REQUEST NO. 28**

Provide the number of special contract therms by customer by month for years 2004-2009 in excel format.

**RESPONSE:**

**REQUEST NO. 29**

Provide the number of special contracts by customers by therms, subject to demand charges, by month for years 2004-2009 in excel format.

**RESPONSE:**

**REQUEST NO. 30**

Provide the amount of revenues recorded for the weather normalization adjustment by

customer class by month for years 2004-2009 in excel format.

**RESPONSE:**

**REQUEST NO. 31**

Provide the amount of therms recorded for the weather normalization adjustment by customer class by month for years 2004-2009 in excel format.

**RESPONSE:**

**REQUEST NO. 32**

Provide in excel format the amount of revenues in the attrition year for the Volkswagen manufacturing plant.

**RESPONSE:**

**REQUEST NO. 33**

Provide in excel format the amount of revenues in the attrition year for any anticipated new special contracts.

**RESPONSE:**

**REQUEST NO. 34**

Provide the volumes by month for years 2004-2009 for each of the following miscellaneous revenues: Reconnect Charges, Service Establishment, Returned Check, Late Payment, Service Work, Damage Billing, and Miscellaneous.

**RESPONSE:**

**REQUEST NO. 35**

Provide in working excel format the number of hourly employees at 12/31/09. Include in your response: each employee name or number; hourly rate per employee; and full time or part time status.

**RESPONSE:**

**REQUEST NO. 36**

Provide in working excel format the number of overtime hours by hourly employee through the twelve months ended 12/31/09. Include in your response, overtime hours by employee (at time and a half rate) and overtime hours by employee (at double time rate).

**RESPONSE:**

**REQUEST NO. 37**

Provide the total amount of payroll compensation for the twelve months ended 12/31/09.

**RESPONSE:**

**REQUEST NO. 38**

Provide in working excel format the number of salary employees at 12/31/09. Include in your response: each employee name or number; and salary rate per employee.

**RESPONSE:**

**REQUEST NO. 39**

Provide the expected pay increase dates for hourly and salary employees after 12/31/09.

**RESPONSE:**

**REQUEST NO. 40**

Provide the expected percentage pay increase for each pay increase date for hourly and salary employees after 12/31/09.

**RESPONSE:**

**REQUEST NO. 41**

Provide the hiring and termination dates for each employee at 6/30/09 and 12/31/09.

**RESPONSE:**

**REQUEST NO. 42**

Provide the amount of payroll dollars capitalized by month for the months 7/31/09 through 12/31/09 in the format of CGC's response to TRA MFG #45.

**RESPONSE:**

**REQUEST NO. 43**

Provide the NARUC or FERC accounts 700 through 932, show the gross and net expense after deducting salaries and wages, by month for the twelve months ended 12/31/09 in the format

of CGC's response to TRA MFG #42.

**RESPONSE:**

**REQUEST NO. 44**

Provide a mapping from CGC's chart of account amounts to the NARUC or FERC account 700 through 932 amounts for the twelve months ended 12/31/09.

**RESPONSE:**

**REQUEST NO. 45**

Provide a mapping from CGC's chart of account amounts to the amounts on lines 7 through 16 of the TRA 3.03 surveillance report for the twelve months ended 12/31/09.

**RESPONSE:**

**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:**

**REQUEST NO. 47**

Provide the Gross Plant and Investment; Number of Customers; and the Direct Operations and Maintenance Expense amount for the twelve months ended 12/31/09 for every AGL business entity.

**RESPONSE:**

**REQUEST NO. 48**

Provide the total AGL services company costs subject to allocation at 12/31/07, 12/31/08 and 12/31/09.

**RESPONSE:**

**REQUEST NO. 49**

Provide the amount of AGL services company costs allocated to each AGL business entity at 12/31/07, 12/31/08, and 12/31/09.

**RESPONSE:**

**REQUEST NO. 50**

Provide the actuarial study for 2009 dated January 2010 for pension expense and liabilities (FAS 87) and post employment benefits other than pensions (FAS 106).

**RESPONSE:**

**REQUEST NO. 51**

Provide the amount of pension contributions made by CGC in 2009. Include in your response the CGC and NARUC accounts charged for pension contributions.

**RESPONSE:**



**REQUEST NO. 52**

Provide the amount of FAS 87 expense recorded by CGC in 2009. Include in your response the CGC and NARUC accounts directly charged and allocated from AGL Services for FAS 87.

**RESPONSE:**

**REQUEST NO. 53**

Provide the current AIP Plan and Long Term Incentive Plan in effect at December 31, 2009.

**RESPONSE:**

**REQUEST NO. 54**

Provide the amounts and the accounts charged to CGC for AIP and Long Term Incentive Plan compensation for the twelve months ended 12/31/09.

**RESPONSE:**

**REQUEST NO. 55**

Provide the State of Tennessee Gross Receipts Tax Returns due August 1, 2008 and August 1, 2009.

**RESPONSE:**

**REQUEST NO. 56**

Provide the State of Tennessee Franchise and Excise Tax Return for 2008 and the amount of estimated payments for 2009.

**RESPONSE:**

**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:**

**REQUEST NO. 58**

Provide the total equalized ad valorem assessment amount for 2007, 2008, and 2009.

**RESPONSE:**

**REQUEST NO. 59**

Provide all documentation, work papers, and calculations supporting the \$1,129,711 decrease in the forecast of property taxes due to the settlement of an appeal with the State of Tennessee.

**RESPONSE:**

**REQUEST NO. 60**

Provide all documentation, work papers, and calculations supporting the amount of franchise fee payments to the City of Chattanooga for the attrition year.

**RESPONSE:**

**REQUEST NO. 61**

Provide the actual Bad Debt Expense write-off experience for the twelve months ended December 31, 2009. Include in your response any amounts related to recovery of damages to the distribution system.

**RESPONSE:**

**REQUEST NO. 62**

Provide all accounting documentation, work papers, and calculations supporting the amount of Bad Debt Expense for the recovery of damages to the distribution system for the attrition year.

**RESPONSE:**

**REQUEST NO. 63**

Provide all accounting documentation, work papers, and calculations supporting the amount of Allocated Taxes Other than Income at December 31, 2009 and for the attrition year.

**RESPONSE:**

**REQUEST NO. 64**

Provide a mapping from CGC's chart of account amounts to the amounts per CGC Exhibit RDH-2, Schedule 2, lines 1 through 12 for the twelve months ended 12/31/09 and the Attrition Period.

**RESPONSE:**

**REQUEST NO. 65**

Provide in working excel format a detailed CGC trial balance as of December 31, 2009.

**RESPONSE:**

**REQUEST NO. 66**

Provide in working excel format a detailed AGL Services trial balance as of December 31, 2009.

**RESPONSE:**

**REQUEST NO. 67**

Provide in working excel format a detailed CGC general ledger for the months of July 2009 through December 2009.

**RESPONSE:**

**REQUEST NO. 68**

Provide in working excel format a detailed AGL Services general ledger for the year ended December 31, 2009.

**RESPONSE:**

**REQUEST NO. 69**

Provide in working excel format the information for Plant in Service and Accumulated Depreciation by account for Chattanooga Gas Company in the following format as of December 31, 2009:

(1)	(2)	(3)	(4)	(5)	(6)
FERC	Account	Plant in Service	Current	Accumulated	Net
<u>Account #</u>	<u>Description</u>	<u>Balance</u>	<u>Depreciation Rate</u>	<u>Depreciation</u>	<u>Book Value</u>

**RESPONSE:****REQUEST NO. 70**

Provide in working excel format the information for Plant in Service and Accumulated Depreciation by account allocated by AGL Services to Chattanooga Gas Company in the following format as of December 31, 2009:

(1)	(2)	(3)	(4)	(5)	(6)
FERC	Account	Plant in Service	Current	Accumulated	Net
<u>Account #</u>	<u>Description</u>	<u>Balance</u>	<u>Depreciation Rate</u>	<u>Depreciation</u>	<u>Book Value</u>

**RESPONSE:**

**REQUEST NO. 71**

Provide the forecasted plant additions, plant retirements, salvage, and the cost of removal by FERC account by month for Chattanooga Gas Company from January 2010 through April 2011.

**RESPONSE:****REQUEST NO. 72**

Provide the forecasted plant additions, plant retirements, salvage, and the cost of removal by FERC account by month allocated by AGL Services to Chattanooga Gas Company from January 2010 through April 2011.

**RESPONSE:****REQUEST NO. 73**

Provide the actual Construction Work in Progress for Chattanooga Gas Company at December 31, 2009.

**RESPONSE:****REQUEST NO. 74**

Provide the actual Construction Work in Progress allocated by AGL Services to Chattanooga Gas Company at December 31, 2009.

**RESPONSE:**

**REQUEST NO. 75**

Provide the actual Materials & Supplies for Chattanooga Gas Company at December 31, 2009.

**RESPONSE:**

**REQUEST NO. 76**

Provide all work papers, calculations, and supporting documentation for CGC's forecast of Stored Gas Inventory per CGC Exhibit RDH-3, Schedule 2, Line 3.

**RESPONSE:**

**REQUEST NO. 77**

Provide all work papers, calculations, and supporting documentation for CGC's forecast of Stored Gas Inventory using the NYMEX future price at 12/31/09.

**RESPONSE:**

**REQUEST NO. 78**

Provide the actual Other Accounts Receivable per CGC Exhibit RDH-3, Schedule 2, Line 4 for Chattanooga Gas Company at December 31, 2009.

**RESPONSE:**

**REQUEST NO. 79**

Provide all work papers, calculations, and supporting documentation for CGC's forecast of Deferred Rate Case per CGC Exhibit RDH-3, Schedule 2, Line 5.

**RESPONSE:**

**REQUEST NO. 80**

Provide the actual Reserve for Uncollectible Accounts per CGC Exhibit RDH-3, Schedule 2, Line 7 for Chattanooga Gas Company at December 31, 2009.

**RESPONSE:**

**REQUEST NO. 81**

Provide the actual Customer Deposits per CGC Exhibit RDH-3, Schedule 2, Line 7 for Chattanooga Gas Company at December 31, 2009 and monthly net additions through April 2011.

**RESPONSE:**

**REQUEST NO. 82**

Provide the actual Accrued Interest on Customer Deposits per CGC Exhibit RDH-3, Schedule 2, Line 9 for Chattanooga Gas Company at December 31, 2009 and monthly net additions through April 2011.

**RESPONSE:**

**REQUEST NO. 83**

Provide all work papers, calculations, and supporting documentation for CGC's forecast of Tax Collections Withheld per CGC Exhibit RDH-3, Schedule 3, Line 24.

**RESPONSE:**



**REQUEST NO. 84**

Provide the actual Accumulated Deferred Income Taxes per CGC Exhibit RDH-3, Schedule 1, Line 6 for Chattanooga Gas Company at December 31, 2009 and monthly net additions through April 2011.

**RESPONSE:**

**REQUEST NO. 85**

Provide the actual Accumulated Deferred Income Taxes per CGC Exhibit RDH-3, Schedule 1, Line 6 allocated by AGL Services to Chattanooga Gas Company at December 31, 2009 and monthly net additions through April 2011.

**RESPONSE:**

**REQUEST NO. 86**

Provide the actual Contributions in Aid of Construction per CGC Exhibit RDH-3, Schedule 1, Line 7 for Chattanooga Gas Company at December 31, 2009 and monthly net additions through April 2011.

**RESPONSE:**

**REQUEST NO. 87**

Provide the actual Customer Advances for Construction per CGC Exhibit RDH-3, Schedule 1, Line 8 for Chattanooga Gas Company at December 31, 2009 and monthly net additions through April 2011.

**RESPONSE:**

**REQUEST NO. 88**

Provide the actual Postretirement Benefits Other than Pensions per CGC Exhibit RDH-3, Schedule 1, Line 3 for Chattanooga Gas Company at December 31, 2009 and monthly net additions through April 2011. Include in your response all source documentation.

**RESPONSE:****REQUEST NO. 89**

Provide the actual capital structure and cost rates on short term debt, long term debt, preferred stock, and common equity for each of the twelve months ending June 30, 2009, 2008, and 2007 for:

- a. Chattanooga Gas Company, subsidiary only
- b. AGL Resources, Inc., parent only, and
- c. AGL Resources, Inc. consolidated.

Include in your response all supporting source documentation, work papers, and calculations.

**RESPONSE:****REQUEST NO. 90**

Provide the forecasted capital structure and cost rates on short term debt, long term debt, preferred stock, and common equity for the attrition year ending April 30, 2011, for:

- a. Chattanooga Gas Company, subsidiary only
- b. AGL Resources, Inc., parent only, and
- c. AGL Resources, Inc., consolidated.

Include in your response all supporting source documentation, work papers, and calculations.

**RESPONSE:**

**REQUEST NO. 91**

Provide the return on equity for Chattanooga Gas Company (subsidiary only) for the fiscal years 1999 through 2009. Include in your response all supporting source documentation, work papers, and calculations.

**RESPONSE:**

**REQUEST NO. 92**

Provide the annual sales volumes by customer class for Chattanooga Gas Company (subsidiary only) for the fiscal years 1999 through 2009. Include in your response all supporting source documentation, work papers, and calculations.

**RESPONSE:**

**REQUEST NO. 93**

Please provide copies of all documents – including, without limitation, work papers, spreadsheets, summaries, charts, notes, exhibits, articles, journals, treatises, periodicals, publications, reports, records, statements, Internet web pages, or financial information – relied upon by Dr. Morin in preparing his Direct Testimony in this matter.

**RESPONSE:**

**REQUEST NO. 94**

For each dividend on common stock paid by Chattanooga Gas Company from January 1, 2004, through December 31, 2009, please provide:

- a. the date on which each dividend was paid
- b. the dollar amount per share of each dividend payment, and
- c. the share price on the date of the dividend payment.

Include in your response all supporting source documentation, work papers, and calculations.

**RESPONSE:**

**REQUEST NO. 95**

For each dividend on common stock paid by AGL Resources, Inc., from January 1, 2004, through December 31, 2009, please provide:

- a. the date on which each dividend was paid
- b. the dollar amount per share of each dividend payment, and
- c. the share price on the date of the dividend payment.

Include in your response all supporting source documentation, work papers, and calculations.

**RESPONSE:**

**REQUEST NO. 96**

For all new issues of common stock since January 1, 1999, by Chattanooga Gas Company or AGL Resources, Inc. please provide the date of the issue, the price per share, the

number of shares issued, the total dollar amount realized from the issue, and whether the shares were sold to the public or distributed or sold internally. Include in your response all supporting source documentation, work papers, and calculations.

RESPONSE:

**REQUEST NO. 97**

Provide the total dollar value of stockholders' equity and the proportion of the total accounted for by common stock, retained earnings and other categories, as well as the market-to-book-value ratio on June 30, 2009, 2008, and 2007 for:

- a. Chattanooga Gas Company, subsidiary only
- b. AGL Resources, Inc., parent only, and
- c. AGL Resources, Inc., consolidated.

Include in your response all supporting source documentation, work papers, and calculations.

RESPONSE:

**REQUEST NO. 98**

Provide the historical risk premium of common stocks over one-year, five-year, ten-year, and twenty-year Treasury Bonds or Bills as reported in Morningstar's *Stocks, Bonds, Bills, and Inflation, 2009 Yearbook* referenced by Dr. Morin in his Direct Testimony at page 23, lines 6-8.

RESPONSE:

**REQUEST NO. 99**

Provide all documents, data, studies or other support relied upon by Dr. Morin in developing his recommended 25 basis point adjustment to the cost of equity due to the company's AUA mechanism (Morin Direct, p. 50, lines 6-14).

**RESPONSE:**

**REQUEST NO. 100**

Provide the market values and percent of revenues from natural gas operations for each of the companies listed on Dr. Morin's Exhibits RAM-4 and RAM-6.

**RESPONSE:**

**REQUEST NO. 101**

For each month from July 2008 through June 2009, please provide Chattanooga Gas Company's actual return on equity and the return on equity that would have been realized had the proposed AUA mechanism been in place. Use the capital structure and appropriate cost rates for the twelve months ending June 30, 2009, in calculating the return on equity. Include in your response all supporting source documentation, work papers, and calculations.

**RESPONSE:**

**REQUEST NO. 102**

Please provide all supporting workpapers and source documents to Exhibits DPY-4, DPY-6, DPY-7, DPY-8, DPY-11, DPY-12 and DPY-13 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:**

**REQUEST NO. 103**

Please refer to lines 14-17, page 7 of Mr. Yardley's Direct Testimony. Provide all documents and analyses undertaken to support the statement that margin reductions attributable to the decline in average use per residential customer have offset the incremental margin created through customer growth.

**RESPONSE:**

**REQUEST NO. 104**

For purposes of this request, please refer to page 7, lines 14 through 17 of Mr. Yardley's Direct Testimony. Please provide, on an annual basis, the calculations supporting the position that "margin reductions attributable to the decline in average use per customer for residential customers since CGC's base rates were last reset has largely offset the incremental margin created through customer growth." Please provide this information in electronic spreadsheet format with all data, formulas, and calculations preserved and all assumptions clearly identified.

**RESPONSE:**

**REQUEST NO. 105**

Please provide the data and calculations used to support the position that average use per customer has declined, on average, about one percent per year from 1980 to 2000 and provide similar data for the period 2000 to current. Please provide this information in electronic

spreadsheet format with all data, formulas, and calculations preserved and all assumptions clearly identified.

**RESPONSE:**

**REQUEST NO. 106**

For purposes of this request, please refer to page 14, lines 4 through 5 of Mr. Yardley's Direct Testimony. Please identify the Company's current energy efficiency efforts, on a per measure basis, as well as their annual participation levels and energy savings, and explain what is meant, both qualitatively and quantitatively, by the opinion that it is Tennessee state policy to promote "additional energy efficiency measures."

**RESPONSE:**

**REQUEST NO. 107**

For purposes of this request, please refer to DPY-5. Please provide all J.D. Power and Associates Surveys (of Gas Utility Companies), conducted since the time of the Company's last rate case.

**RESPONSE:**

**REQUEST NO. 108**

For purposes of this request, please refer to page 16, lines 6 through 7 of Mr. Yardley's Direct Testimony. Please specifically identify the page and paragraph where the following statement is made or suggested in DPY-5: "...noted that LDCs with revenue decoupling



programs tend to have higher customer satisfaction because they communicate more frequently with customers about energy efficiency options.”

**RESPONSE:**

**REQUEST NO. 109**

For purposes of this request, please refer to page 30, line 23 of Mr. Yardley’s Direct Testimony. Please provide the cost information associated with serving new customers in CGC’s service territory that was examined by Mr. Yardley in reaching the conclusion that “the addition of new customers entails substantial capital expenditures.” Please identify each major component/category of costs needed to serve new customers, the date of the cost estimates examined in reaching this conclusion, and the type of customer assumed (i.e., residential, commercial, industrial, or total).

**RESPONSE:**

**REQUEST NO. 110**

For purposes of this request, please refer to page 31, lines 15 through 18 of Mr. Yardley’s Direct Testimony. Please provide all analyses of the non-conservation-related changes for CGC’s customers that were conducted by Mr. Yardley in reaching this conclusion.

**RESPONSE:**

**REQUEST NO. 111**

For purposes of this request, please refer to page 31, lines 15 through 18 of Mr. Yardley's Direct Testimony. Please explain how the customers excluded from revenue decoupling will also be excluded from the Company's customer education and outreach efforts for energy efficiency.

**RESPONSE:****REQUEST NO. 112**

For purposes of this request, please refer to page 31, lines 15 through 18 of Mr. Yardley's Direct Testimony. Please identify the potential non-conservation related changes in usage referenced by Mr. Yardley.

**RESPONSE:****REQUEST NO. 113**

For purposes of this request, please refer to DPY-12. Please provide DPY-12, on an annual historic basis, for each year since the Company's last rate case. Please identify the total annual surcharges or credits that would have arisen had decoupling been in place since the time of the Company's last rate case. Provide all workpapers and source documents used in connection with this response. Provide the requested 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:**

**REQUEST NO. 114**

Refer to page 31 of Mr. Yardley's Direct Testimony. Please refer to lines 9-10, page 29 of Mr. Yardley's Direct Testimony. Please provide the referenced analyses of customers, rates and usage trends under each of the Company's rate schedules. Provide all supporting workpapers and source documents 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:****REQUEST NO. 115**

Please refer to lines 22-23, page 29 of Mr. Yardley's Direct Testimony. Please provide all customer usage projections used in testing the decoupling mechanism. Provide all supporting workpapers and source documents 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:****REQUEST NO. 116**

Please provide all analyses used to test the performance of the decoupling mechanism. Provide all supporting workpapers and source documents 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:**

**REQUEST NO. 117**

Line 7, page 31 of Mr. Yardley's Direct Testimony refers to "relatively modest level of expected customer growth." Please quantify this expected growth and the time period to which it refers and provide all analyses undertaken to make the statement that growth will be relatively modest. Provide all supporting workpapers and source documents 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:**

**REQUEST NO. 118**

Referring to Exhibit DPY-12, please explain how the projected sales will be estimated for each recovery period.

**RESPONSE:**

**REQUEST NO. 119**

Referring to Exhibit DPY-13, Alignment and Usage Adjustment tariff, please explain how any Reconciliation Adjustment for the prior period AUA will be recovered from customers.

**RESPONSE:**

**REQUEST NO. 120**

Please provide copies of all monthly, annual, and/or other periodic filings regarding the AUA, its calculation and/or collection, that the Company proposes to file with the TRA. If the Company has yet to finalize its planned reports, please describe the information that will be presented to the TRA in the reports and the intervals at which they will be filed.

**RESPONSE:****REQUEST NO. 121**

Provide all correspondence, memoranda, in-house analyses and reports, and other documents which describe or discuss the Company's decision to withdraw its decoupling proposal in Docket No. 06-00175.

**RESPONSE:****REQUEST NO. 122**

Please refer to lines 13-15, page 14 of Mr. Yardley's Direct Testimony. For each potential benefit, quantify the likelihood that gas bills will be lower.

**RESPONSE:****REQUEST NO. 123**

Please refer to lines 18-19, page 15 of Mr. Yardley's Direct Testimony. Provide all analyses, studies and other documentation which examine the projected impact on supply and demand and consumer prices from reduced consumption levels. Please provide any associated documentation for the information provided in response to this request. 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:**

**REQUEST NO. 124**

For purposes of this request, please refer to page 4, lines 17 through 18 of Mr. Lindsey's Direct Testimony. 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:**

**REQUEST NO. 125**

Please provide the data and calculations, in electronic spreadsheet format, that calculate the \$0.5 million reduction in base revenues from those projected in Docket No. 06-00175 (\$31.9 million). Provide the requested 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:**

**REQUEST NO. 126**

Please provide the data and calculations, in electronic spreadsheet format, that calculate the \$1.4 million reduction in base revenues from those projected in Docket No. 06-00175 (\$31.9 million). Please separately identify those revenue losses associated with changes in usage per customer (UPC) and those associated with changes in the number of customers. 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:****REQUEST NO. 127**

Please provide the original forecasts, on a per customer class/tariff basis, for the estimated UPC and estimated number of customers upon which the \$31.9 million revenue projection in Docket No. 06-00175 was based.

**RESPONSE:****REQUEST NO. 128**

Please provide the Company's load forecast that was current as of Docket 06-00175 on a per customer class basis. This information should be provided in electronic format with all calculations, assumptions and formulae. To the extent a statistical software package was utilized to develop this forecast, please identify the software and the version utilized, and provide all input and output information utilized/generated by the package to generate the customer class specific forecasts. 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:**

**REQUEST NO. 129**

Please provide the Company's most recent load forecast, on a per customer class basis. This information should be provided in electronic format with all calculations, assumptions and formulae. To the extent a statistical software package was utilized to develop this forecast, please identify the software and the version utilized, and provide all input and output information utilized/generated by the package to generate the customer class specific forecasts. 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:**

**REQUEST NO. 130**

For purposes of this request, please refer to page 5, lines 18 to 21 of Mr. Lindsey's Direct Testimony. Please provide the data/information upon which the 70 percent/30 percent split in commodity and base gas costs are based.

**RESPONSE:**



**REQUEST NO. 131**

For purposes of this request, please refer to page 5, lines 18 to 21 of Mr. Lindsey's Direct Testimony. Please provide, on a monthly basis, since the last rate case, the share of commodity to base gas costs in a format comparable to the previous question. Please provide and identify all calculations, data, and assumptions used to calculate these shares. 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:****REQUEST NO. 132**

For purposes of this request, please refer to page 5 of Mr. Lindsey's Direct Testimony. Please identify, to the best of the Company's knowledge, any natural gas or electric distribution utility that had its earnings compromised by the promotion of energy efficiency and conservation programs.

**RESPONSE:****REQUEST NO. 133**

For purposes of this request, please refer to page 5 of Mr. Lindsey's Direct Testimony. Please identify, to the best of the Company's knowledge, any natural gas or electric distribution utility that had its service quality or reliability compromised by the promotion of energy efficiency and conservation programs.

**RESPONSE:**

**REQUEST NO. 134**

Please provide all empirical studies that estimate, calculate, or otherwise demonstrate that the promotion of energy efficiency and conservation programs will compromise a regulated utility's (including the Company's) ability to earn a just and reasonable rate of return or compromise the ability to provide reliable service.

**RESPONSE:****REQUEST NO. 135**

Please provide the most recent version of the Company's forecast for natural gas commodity prices used for planning purposes.

**RESPONSE:****REQUEST NO. 136**

For purposes of this request, please refer to page 6, line 3 of Mr. Lindsey's Direct Testimony. Please demonstrate, for each of the past five years, that the Company's capital costs (investment) have been constant. 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:**

**REQUEST NO. 137**

For purposes of this request, please refer to page 6, line 3 of Mr. Lindsey's Direct Testimony. Identify each "cost" of the Company's that has not changed over the last five years. For each "cost" state the amount of the cost for each of the last five years, the account number the cost is booked to, and the name of the account.

**RESPONSE:****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:****REQUEST NO. 139**

For purposes of this request, please refer to page 6, line 12 of Mr. Lindsey's Direct Testimony. Please clearly articulate Tennessee's "energy policy agenda" including any numeric, or percentage, energy efficiency goals and the time period under which these goals are being attained. 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:**

**REQUEST NO. 140**

Please identify which LDCs the Company believes are leaders in the development of natural gas energy efficiency measures/programs and explain the rationale for each utility identified.

**RESPONSE:**

**REQUEST NO. 141**

For purposes of this request, please refer to page 13, line 25, and page 14, lines 1 through 8, of Mr. Lindsey's Direct Testimony. Please identify which programs included in the Company's current filing are based upon programs being pursued by its affiliates in other states. Please identify the specific affiliate and the state in which the program(s) are offered.

**RESPONSE:**

**REQUEST NO. 142**

Please provide the following information for each of the Company's gas distribution utility affiliates. a description of each energy efficiency program offered in 2007, 2008, and 2009 and the total energy savings in therms resulting from each program the first two years the program was in existence and for the years 2007, 2008, and estimated 2009.

**RESPONSE:**

**REQUEST NO. 143**

For purposes of this request, please refer to page 17, lines 7 through 8 of Mr. Lindsey's Direct Testimony. Please identify, on an annual basis on a pipeline miles basis, the Company bare steel replacement activities. Please explain how these annual replacement efforts differ, if at all, from the Department of Transportation Form RSPA F7100.1-1.

**RESPONSE:****REQUEST NO. 144**

Please provide, on an annual basis from 2000 to current, the Company's Department of Transportation Form RSPA F7100.1-1 reports filed with the U.S. Department of Transportation, Office of Pipeline Safety. Please explain any and all differences between actual replacement and reported inventory levels and those filed with the U.S. DOT.

**RESPONSE:****REQUEST NO. 145**

For purposes of this request, please refer to page 18, lines 7 through 15, of Mr. Lindsey's Direct Testimony. Please identify how much of the \$2.6 million revenue deficiency is associated with a decrease in usage per customers or total number of customers and reconcile this amount with the purported \$1.4 million revenue deficiency identified on page 4, lines 17 through 18 of Mr. Lindsey's Direct Testimony. Please provide the data and calculations used to conduct this analysis in electronic spreadsheet format with all calculations, formulae, and assumptions. 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:**

**REQUEST NO. 146**

Provide all studies, analyses, investigations, reviews, examinations, or assessments performed by or for the Company in connection with the proposed Alignment and Usage Adjustment mechanism. Provide any associated documentation for the information provided in response to this request and explain all assumptions used. 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 does not exist in the exact format requested, please provide it in the format in which it is available and explain why it is not available in the format requested.

**RESPONSE:**

**REQUEST NO. 147**

Please quantify, individually, the impacts that weather variability, warming temperatures, ongoing energy conservation, and efficiency efforts of customers have had on the Company's financial performance. Provide all workpapers used in the documents provided. Provide the 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 does not exist in the exact format requested, please provide it in the format in which it is available and explain why it is not available in the format requested.

**RESPONSE:**

**REQUEST NO. 148**

Please quantify, individually, the impacts that weather variability, warming temperatures, ongoing energy conservation, and efficiency efforts of customers have had on the Company's customers' bills. Provide all workpapers used in the documents provided. Provide the 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 does not exist in the exact format requested, please provide it in the format in which it is available and explain why it is not available in the format requested.

**RESPONSE:****REQUEST NO. 149**

State the amount of base revenue increase or decrease authorized by the TRA for any rate increase or decrease implemented in 2004, 2005, 2006, 2007, 2008 and 2009. For each rate change state the date the rate change was implemented by the Company, the return on equity and overall rate of return allowed by the TRA, the capital structure used to develop the allowed rate of return, and state the test year associated with the rate change.

**RESPONSE:****REQUEST NO. 150**

Please provide supporting workpapers and source documents for each of the following Exhibits: MHS-1, MHS-2, MHS-3, MHS-4, MHS-5, MHS-6, and MHS-7. Provide any associated documentation for the information provided in response to this request and explain all assumptions used. 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 does not exist in the exact format requested, please provide it in the format in which it is available and explain why it is not available in the format requested.

**RESPONSE:**

**REQUEST NO. 151**

Please provide all supporting workpapers and source documents to Exhibits DJN-1, DJN-2, and DJN-3 in electronic spreadsheet form, with all links and formulas intact, source data used, and explain all assumptions and calculations used. Please provide any associated documentation for the information provided in response to this request. 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. To the extent that the sources for any assumptions are only available in hard copy, please provide a copy of the source document in hard copy.

**RESPONSE:**

**REQUEST NO. 152**

Please refer to lines 13-16, page 5 of Mr. Nikolich's Direct Testimony and the general assumptions used by the Company. Specifically, the avoided commodity cost assumption that was assumed to be equal to the purchased gas portion of the Company's monthly billing rate, which was escalated at the same rate as the Henry Hub prices taken from the NYMEX strip October 22, 2009. Please provide the source document used for the escalation rate.

**RESPONSE:**



**REQUEST NO. 153**

Please refer to lines 13-16, page 5 of Mr. Nikolich's Direct Testimony. Please provide the workpapers used to develop the escalated avoided capacity costs 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 does not exist in the exact format requested, please provide it in the format in which it is available and explain why it is not available in the format requested.

**RESPONSE:****REQUEST NO. 154**

Please refer to lines 13-16, page 5 of Mr. Nikolich's Direct Testimony and the general assumptions used by the Company. Specifically the capacity avoided cost assumption that was derived from the commercial C-2 purchased gas demand rate charged to customers as of October 1, 2008 escalated each year for inflation. Please explain why the Company chose the commercial C-2 purchased gas demand rate charged to customers as of October 1, 2008 as the avoided capacity cost.

**RESPONSE:****REQUEST NO. 155**

Please provide the source document used for the escalation rate and the avoided capacity cost. Please provide the workpapers used to develop the escalation rate and annual avoided capacity costs 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 does not exist in the

exact format requested, please provide it in the format in which it is available and explain why it is not available in the format requested.

**RESPONSE:**

**REQUEST NO. 156**

Please refer to lines 21-23, page 5 and lines 1-4 of Mr. Nikolich's Direct Testimony. Provide the source documents utilized for each measure life's used by the Company.

**RESPONSE:**

**REQUEST NO. 157**

For each program and the cost benefit analysis performed, please state whether or not the Company assumed there was spillover, kick-backs, or free-riders associated with the program. Explain the Company's rationale for assuming that there was or was not spillover, kick-backs or free-riders and provide documentation relied upon by the Company to support its assumption.

**RESPONSE:**

**REQUEST NO. 158**

Please refer to the program-specific assumptions for each program referred on the pages 6-15 of Mr. Nikolich's Direct Testimony. Provide supporting documentation for each assumption, in electronic spreadsheet form, with all links and formulas intact, source data used, and explain all assumptions and calculations used. Please provide any associated documentation for the information provided in response to this request. 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:**

**REQUEST NO. 159**

Please refer to lines 22-23, page 12 of Mr. Nikolich's Direct Testimony, where he states, "No free riders were assumed since the average life of the measure 15 years is less than the 25 year life of the equipment." Provide all analyses done which support the contention that use of a measure of life of 15 years versus the useful life of 25 years for the equipment justifies the assumption that there are no free riders.

**RESPONSE:**

**REQUEST NO. 160**

For each residential and commercial energySMART program, please explain in detail how the proposed incentive amounts were determined. Identify all alternative incentive amounts considered and explain why they were not selected. Provide workpapers and supporting documentation for each assumption, in electronic spreadsheet form, with all links and formulas intact, source data used, and explain all assumptions and calculations used. Please provide any associated documentation for the information provided in response to this request. 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:**

**REQUEST NO. 161**

Please refer to lines 17-18, page 3 of Mr. Nikolich's Direct Testimony which states the RIM test determines "the impact that a program will have on non-participating rate payers." Please clarify if the RIM tests the impact of a measure only on non-participating ratepayers, or on all ratepayers and cite any references for this response?

**RESPONSE:****REQUEST NO. 162**

Please refer to line 23, page 15 through line 1, page 16 of Mr. Nikolich's Direct Testimony which states "While the Rate Impact Measure Test shows a benefit/cost ratio of 0.80, an increase in gas costs will push this test to a favorable result." Please quantify the magnitude of the increase in gas costs needed to result in a favorable benefit/cost ratio for this test. Provide supporting workpapers and documentation each assumption used in the preparation of this response. Provide the documents 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:****REQUEST NO. 163**

Please refer to the energySMART Recovery Adjustment discussion on pages 16-17 of Mr. Nikolich's Direct Testimony. Please provide the following for each affiliate of the Company

that has a tariff similar to the energySMART Recovery Adjustment. the tariff pages containing the company's energy efficiency cost recovery adjustment tariff.

**RESPONSE:**

**REQUEST NO. 164**

Please provide a copy of the Freedonia Group market research report referenced on page 4 of Mrs. Peeples's Direct Testimony.

**RESPONSE:**

**REQUEST NO. 165**

Please provide a copy of all RKS Research and Consulting benchmarking surveys referenced on page 5 of Mrs. Peeples's Direct Testimony.

**RESPONSE:**

**REQUEST NO. 166**

Provide documentation supporting the rule of seven and its applicability to the Company's proposed conservation programs.

**RESPONSE:**

**REQUEST NO. 167**

Please provide a copy of the carbon calculator referenced on line 17, page 8 of Mrs. Peeples's Direct Testimony. If the carbon calculator is not available, please explain why not.

**RESPONSE:**

**REQUEST NO. 168**

Provide examples of all instances where the Company will leverage “existing creative and relationships to achieve cost synergies – but not at the expense of successfully conveying this important information to CGC customers.” State the amount of cost synergies that will be achieved by year and explain how they will be achieved. Provide all documents supporting this response. Provide where applicable all documents 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:****REQUEST NO. 169**

Please refer to page 10, lines 1-3 of Ms. Peebles’s testimony, where she states: “In fact, as discussed in the testimony of Steve Lindsey, if a customer takes advantage of our programs, a residential customer could potentially save up to \$280 annually.” Provide all documents and workpapers supporting this statement. Provide where applicable all documents 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:**

**REQUEST NO. 170**

Please refer to page 11, lines 1-3 of Ms. Peeples's testimony, where she states: "If a commercial customer takes advantage of our programs, that customer could potentially save approximately \$500 annually." Provide all documents and workpapers supporting this statement. Provide where applicable all documents 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:****REQUEST NO. 171**

Please provide the estimated start-up and annual costs, including all assumptions, of the Community Outreach and Customer Education program. Provide supporting workpapers for the estimated start-up and annual costs. Provide the documents 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:****REQUEST NO. 172**

Provide a detailed description of all Company energy efficiency and energy conservation programs now in operation in Tennessee and the date each program was begun.

**RESPONSE:**

**REQUEST NO. 173**

Provide the annual energy savings and cost to date of each of the Company's current energy efficiency and energy conservation programs.

**RESPONSE:**

**REQUEST NO. 174**

Provide all cost benefit studies examining the cost and benefits of each of the Company's energy efficiency and energy conservation programs now in operation in Tennessee.

**RESPONSE:**

**REQUEST NO. 175**

Provide all literature in the Company's possession, custody or control which examines the energy and demand savings associated with the energy efficiency programs proposed in the instant application.

**RESPONSE:**

**REQUEST NO. 176**

Provide all documents in the Company's possession, custody or control which set forth the methods, criteria, and techniques that will be utilized by the Company to measure the success of its proposed energy efficiency and conservation programs proposed as part of its decoupling request.

**RESPONSE:**



**REQUEST NO. 177**

Please identify all annual amounts of cast iron and bare steel replaced, by year, for each of the past 10 years and as projected for the next 5 years.

**RESPONSE:**

**REQUEST NO. 178**

Please identify the type of pipe replaced, pipe replaced by diameter class, miles of pipe replaced, and cost of replacing pipe by year for the past 10 years and as projected for the next 5 years.

**RESPONSE:**

**REQUEST NO. 179**

Please identify the number of leaks per year over the past 10 years, by type of pipe on the Company's system.

**RESPONSE:**

**REQUEST NO. 180**

State the amount of O&M incurred by the Company in each of the last 10 years and the test year associated with repairing corrosion leaks.

**RESPONSE:**

**REQUEST NO. 181**

State the amount of O&M projected to be incurred by the Company during each of the

next 5 years 2009, 2010, 2011, 2012, and 2013 associated with repairing corrosion leaks.

**RESPONSE:**

**REQUEST NO. 182**

Please provide all studies, analyses, investigations, reviews, examinations, or assessments performed by or for the Company that address the need to replace distribution plant, by account, that is not associated with growth.

**RESPONSE:**

**REQUEST NO. 183**

Please provide the Company's complete budgets, with all associated explanations, to replace its distribution mains and services as they were prepared and modified for each of the years 2006, 2007, 2008, 2009, 2010 and 2011.

**RESPONSE:**

**REQUEST NO. 184**

Provide the Company's leak repair cost per mile for each of the years 2004, 2005, 2006, 2007 and 2008 and 2009 to date. Provide the workpapers and source documents supporting this response.

**RESPONSE:**

**REQUEST NO. 185**

Please explain how the Company derived the repair cost for non-cathodically-protected steel main.

**RESPONSE:**

**REQUEST NO. 186**

When the Company replaces steel mains, please explain in detail its policy for doing routine and non-routine maintenance or other mains in close proximity to the replaced facilities.

**RESPONSE:**

**REQUEST NO. 187**

Provide all policies in effect concerning the Company's accounting for leak replacement costs versus other maintenance costs that are not a function of the replacement costs.

**RESPONSE:**

**REQUEST NO. 188**

State the amount of routine and non-routine maintenance done on steel mains in close proximity to steel mains that are being replaced for each of the last ten years and as projected for the next five years.

**RESPONSE:**

**REQUEST NO. 189**

Please provide a detailed explanation of the Company's CIAC policy and any allowances for plant categories for which the Company collects CIAC. Provide all calculations of any

allowances provided to each customer class and explain all assumptions used. 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:**

**REQUEST NO. 190**

Please provide the average number of customers for each current and proposed rate class for the calendar years 1999 through 2009 and as projected for 2010 and 2011. Please provide the source documents containing the customer data supplied in response to this request. 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:**

**REQUEST NO. 191**

Please provide actual therm usage data for each current and proposed rate class for the calendar years 1999 through 2009 and as projected 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:**

**REQUEST NO. 192**

Please provide normalized (weather adjusted) therm usage data for each current and proposed rate class for the calendar years 1999 through 2009 and as projected 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:**

**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:**

**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:****REQUEST NO. 195**

Please provide a detailed cost breakout (by primary USOA Account) that shows the cost of adding a new customer versus the embedded (average) cost of serving existing customers. Please provide any associated documentation for the information provided in response to this request. 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:****REQUEST NO. 196**

Please provide the most recent S&P, Moody's and Fitch credit ratings for AGL Resources, as well as those as of Dec. 31, 2008, Dec. 31, 2007, Dec. 31, 2006, and Dec. 31, 2005.

**RESPONSE:**

**REQUEST NO. 197**

For each adjustment clause, rider, or other mechanism that allows the Company to collect revenues by means other than base rates, please provide for each of the calendar years 2004 through 2008 and as projected for 2009, 2010, and 2011, the total company expense, revenue, and rate base (if applicable) associated with the revenue collected under these mechanisms. Please provide any and all 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:****REQUEST NO. 198**

Provide a recast of the Company's financial results (this would include revenue, expenses, rate base, capital, return on equity, and return on rate base) for the years 2004 through 2008 assuming the Company's proposed revenue decoupling mechanism had been implemented in 2004 through 2008, using 2003 as the base year. Provide all workpapers (in electronic spreadsheet format with all formulas and links intact) and supporting documents used to develop this response and explain all assumptions and calculations used.

**RESPONSE:****REQUEST NO. 199**

Please provide the following for each energy efficiency program proposed in this proceeding: 1) the lost margin due to the energy savings associated with each program for each the first five years; 2) the energy savings by year for the first five years; 3) the number of

participants by year for the first five years; and 4) company's itemized expenditures for the proposed energy efficiency programs for the first five years.

**RESPONSE:**

**REQUEST NO. 200**

Please provide the following for each energy efficiency program currently in existence:

1) the annual lost margin due to the energy savings associated with each program since inception; 2) the annual energy savings for each program since inception; 3) the annual number of participants since inception; and 4) the annual company expenditures for the proposed energy efficiency programs for the first five years.

**RESPONSE:**

**REQUEST NO. 201**

Admit or Deny: Capacity Demand Costs of Chattanooga Gas Company is 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.

**RESPONSE:**



**REQUEST NO. 202**

If the preceding interrogatory is “admitted,” how much profit was earned by SouthStar on the capacity demand costs purchased from Chattanooga Gas Company through Sequent Energy Management. Please provide your answer by year from the period of 2003 until the present.

**RESPONSE:**

**REQUEST NO. 203**

Provide the December 2009 TRA 3.03 Surveillance Report.

**RESPONSE:**

**REQUEST NO. 204**

Please provide electronic copies (preferably in Microsoft Excel format) of any and all exhibits filed with, or in relation to, CGC’s Petition and not already provided in response to a preceding request.

**RESPONSE:**

**REQUEST NO. 205**

Identify any and all expert witnesses the Company intends to call in support of the petition in this docket, and for each expert witness:

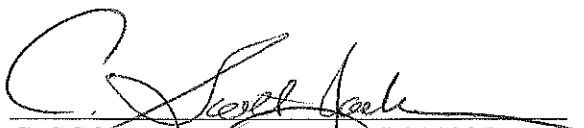
- (a) Identify the field in which the witness is to be offered as an expert;

- (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;
- (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;
- (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;
- (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;
- (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;
- (g) Identify any exhibits to be used as a summary of or support for the testimony or opinions provided by the expert; and
- (h) Please produce copies of all documents, summaries, charts, trade articles, journals, treatises, publications, workpapers, and file notes produced by any proposed expert witness in evaluating, reaching conclusions or formulating an opinion in this matter;
- (i) Please produce copies of all pre-filed testimony produced or sponsored by the Company's expert witnesses in the last five years.

**RESPONSE:**

RESPECTFULLY SUBMITTED,

ROBERT E. COOPER, JR., BPR# 010934  
Attorney General and Reporter

A handwritten signature in black ink, appearing to read "C. Scott Jackson", is written over the printed name and title of the Senior Counsel.

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served via U.S. Mail or electronic mail upon:

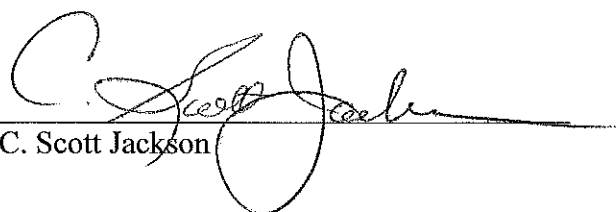
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This the 6th day of January, 2010.

  
C. Scott Jackson