

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

April 19, 2010

IN RE:)	
)	
GENERIC DOCKET TO CONSIDER)	
MODIFYING NOTICE REQUIREMENTS)	Docket No. 10-00040
FOR RATE CASES)	
)	

**CHATTANOOGA GAS COMPANY'S COMMENTS REGARDING
NOTICE REQUIREMENTS FOR RATE CASES**

Chattanooga Gas Company ("CGC" or "Company") respectfully submits these comments in response to the Tennessee Regulatory Authority's ("TRA" or "Authority") Notice of Filing Comments that was issued in this docket on March 22, 2010. The TRA has requested comments about the notice requirements for rate cases. CGC believes that the current practices and procedures as set forth in TRA Rule 1220-4-1-.05 work well, especially for utilities such as CGC that serve primarily urban areas.

CGC is a public utility engaged in the business of transporting, distributing, and selling natural gas in Chattanooga and Cleveland, Tennessee, and in portions of Hamilton and Bradley Counties. These primarily urban areas are served by The Chattanooga Times Free Press, which is a newspaper of general circulation in Hamilton and Bradley Counties. Cleveland and Bradley County also have a local paper, the Cleveland Daily Banner, which covers the Cleveland community. In its current rate case (Docket 09-00183), CGC caused public notice to be published in both The Chattanooga Times Free Press and the Cleveland Daily Banner. As CGC's service area is generally urban, there have been multiple newspaper articles and opinion editorials published in the

Chattanooga Times Free Press as well as both radio and television news media coverage of its request for a rate increase and new rate design. In fact, the April 6th public hearing regarding service standards that the TRA held in Chattanooga resulted in additional print and television coverage of CGC's rate case. CGC believes that, based on this recent experience, the TRA's practices and procedures regarding public notice for rate cases are working well and should continue without significant modification.

If the TRA is looking for cost effective ways to enhance the current practices and procedures, CGC suggests that the TRA could designate a section on its website to identify current rate case proceedings and to allow companies to post public notice of rate cases. Additionally, the TRA website could provide a link to the individual company's website where notice could also be posted. Using the existing TRA and company websites would be a cost effective way to provide the public with continual notice and enhance the current practices and procedures without increasing the costs associated with rate case filings.¹

In conclusion, CGC believes that the current practices and procedures as set forth in TRA Rule 1220-4-1-.05 are working well as evidenced by CGC's current rate case (Docket 09-00183). If any changes are made, CGC would encourage the TRA to look for

¹ As evidenced by its filing on April 9, 2010 in Docket 09-00183, CGC incurred approximately \$2,500.00 to publish notice in the Chattanooga Times Free Press and approximately \$650.00 to publish notice in the Cleveland Daily Banner. Requiring multiple publications in newspapers would cause additional costs to be incurred. CGC believes that posting public notice on the TRA's and its own websites will enhance the current public notice requirements while being more cost effective. Further, while CGC believes that billing inserts can be an effective means of communication with its customers, it costs the company to create, print, and include billing inserts in monthly bills. This will cause an increase in rate case costs which must ultimately be recovered from customers. Since CGC's customers are receiving multiple forms of notice through print, television, and radio as a result of the TRA's current practices and procedures, CGC does not believe that this increased cost is necessary and justified and believes that using more cost effective means to enhance the current practices and procedures would be more advisable.

cost effective ways to enhance the current public notice requirements such as posting notice on the TRA and company websites.

Respectfully submitted,

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