

**IN THE TENNESSEE PUBLIC UTILITY COMMISSION  
AT NASHVILLE, TENNESSEE**

<b>IN RE:</b>	)	
	)	
<b>CHATTANOOGA GAS COMPANY</b>	)	
<b>PETITION FOR APPROVAL OF AN</b>	)	<b>DOCKET NO. 18-00017</b>
<b>ADJUSTMENT IN RATES AND</b>	)	
<b>TARIFF; THE TERMINATION OF THE</b>	)	
<b>AUA MECHANISM AND THE</b>	)	
<b>RELATED TARIFF CHANGES AND</b>	)	
<b>REVENUE DEFICIENCY RECOVERY;</b>	)	
<b>AND AN ANNUAL RATE REVIEW</b>	)	
<b>MECHANISM</b>	)	

**DISCOVERY REQUESTS OF  
THE CHATTANOOGA REGIONAL MANUFACTURERS ASSOCIATION**

The Chattanooga Regional Manufacturers Association (“CRMA”), having been granted intervention in the above-captioned proceeding, submits the following discovery requests to Chattanooga Gas Company (“CGC”).

**DEFINITIONS**

A. “The Company,” “CGC” and “Chattanooga” all refer to the Chattanooga Gas Company, as well as its agents, attorneys, representatives or any other person acting or purporting to act on its behalf.

B. “And” and “or” shall be construed conjunctively or disjunctively as necessary to make the interrogatory inclusive rather than exclusive. The singular shall include the plural, and vice-versa, where appropriate.

C. “Communication” means any transmission of information by oral, graphic, written, pictorial, or otherwise perceptible means including, but not limited to, telephone conversations, letters, memoranda, electronic correspondence, meetings and personal conversations.

D. “Document” means, in the broadest sense possible, any medium upon which information has been recorded or retrieved, whether in draft or final form, and includes the original and each copy thereof if the copy contains additional material or is not identical to the original, which is in your or your agent’s possession, custody or control or which was, but is no longer, in your or your agent’s possession, custody or control.

E. The word “identify” with respect to:

- (1) any natural person, means to state the full name; telephone number; and the last known residence and business addresses of the person and that person’s relationship, whether business, commercial, professional, or personal with you;
- (2) any legal person, business entity or association, means to state the full name; telephone number; and last known address of such person or entity;
- (3) any document, means to state the type of document (e.g., a letter); the title; the subject matter; the date the document bears and the date it was written; and
- (4) any oral communication, means to state the date when and the place where it was made; the identity of the person who made it; the identity of the person to whom it was made; the identity of any other person or persons who were present or who heard it; and the substance of it.

F. “Person” shall mean an individual, partnership, proprietorship, corporation, association, and any other kind of business or legal entity.

G. “Relates to” means constitutes, contains, records, discusses, summarizes, discloses, and/or refers to, in whole or in part.

H. “Petition,” “case,” “proceeding,” and “docket” refer to the above-captioned rate case.

### **INSTRUCTIONS**

1. To the extent that the information sought is incorporated or contained in a document, please identify the document.

2. If you object to a question on the basis of privilege, state in detail the facts on which you base your objection. If you claim a document is privileged, identify the document and state the basis for the privilege.

3. These interrogatories shall be deemed to be continuing and to require supplemental answers to the extent required by the Tennessee Rules of Civil Procedure and the rules of the Tennessee Regulatory Authority.

### **DISCOVERY REQUESTS**

1. Please provide the number of balancing days that Chattanooga Gas Company (CGC) has issued going back for the last three winters (Starting November 2015).

**RESPONSE:**

2. Please provide the amount of over-run gas (penalty gas) that CGC billed going back for the last three winters. (Starting November 2015).

**RESPONSE:**

3. Please provide the penalty revenue that was credited to the PGA account attributable to penalty gas going back for the last three winters (Starting November 2015).

**RESPONSE:**

4. Please provide the total units (Dekatherms) of incremental gas that was sold to CGC's I-1/T-1 customers going back for the last three winters (Starting November 2015).

**RESPONSE:**

5. Please provide CGC's LNG inventory activity going back for the last three winters (starting November 2015). Please differentiate the volumes that were injected/withdrawn attributable to CGC's affiliate companies.

**RESPONSE:**

6. Please provide a daily itemization of the daily penalty rates that would be applicable each day for January 2018 if CGC's proposed tariff is approved.

**RESPONSE:**

7. Please provide CGC's thru-put volumes for the last three winters going back to November 2015. For each day, provide an itemization of the Company's nominated volumes, third-party volumes, LNG Volumes and pipeline/other

**RESPONSE:**

8. Please provide an itemization of the CGC's customers additions for the last five years by rate class. (This can be based on the CGC's gas delivery request and not actual added meters.) Does CGC have a forecast of the added customers used to project future thru-put requirements?

**RESPONSE:**

9. Based on the current natural gas requirements of the T-1/I-1 Interruptible Sales Class, would CGC be able to accommodate a request from every customer in this class to switch to the F-1/T-2 large firm rate?


**RESPONSE:**

10. TVA and many area electric distributors have created many kinds of interruptible/recallable rates to manage their peak loads in ways that are more economical than adding peak capacity. Has CGC ever considered any demand-side rates or programs to incentivize CGC's large firm customers to be interruptible or shed load in order to reduce peak demand? If not, why not?

**RESPONSE:**

Respectfully submitted,

BRADLEY ARANT BOULT CUMMINGS LLP

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 23rd day of March, 2018, a copy of the foregoing document was served on the parties of record, via electronic email transmission and regular U.S. Mail, postage prepaid, addressed as follows:


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