

**BEFORE THE TENNESSEE PUBLIC UTILITY COMMISSION  
NASHVILLE, TENNESSEE**

**March 27, 2018**

**IN RE:** )  
)  
**CHATTANOOGA GAS COMPANY** )  
**PETITION FOR APPROVAL OF AN** )  
**ADJUSTMENT IN RATES AND** )  
**TARIFF; THE TERMINATION OF** )  
**THE AUA MECHANISM AND THE** )  
**RELATED TARIFF CHANGES AND** )  
**REVENUE DEFICIENCY** )  
**RECOVERY; AND AN ANNUAL** )  
**RATE REVIEW MECHANISM** )

**Docket No.**  
**18-00017**

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**CHATTANOOGA GAS COMPANY RESPONSE TO CONSUMER ADVOCATE  
MOTION FOR LEAVE TO ISSUE MORE THAN FORTY DISCOVERY REQUESTS**

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Chattanooga Gas Company (“Company” or “CGC”), pursuant to Rules 1220-01.02.06(2) and 1220-01.02.11(5)(a), of the rules of the Tennessee Public Utility Commission (“TPUC” or “Commission”), hereby files this response to the Motion for Leave to Issue More Than Forty Discovery Requests (“Motion”) filed by the Consumer Protection and Advocate Division of the Office of the Attorney General (“CPAD”), and states as follows:

1. On March 20, 2018, CPAD filed its Motion seeking to expand the scope of its permissible discovery beyond the 40 discovery requests authorized by Rule 1220-01.02.11(5)(a). Simultaneously received with the Motion and its supporting memorandum was CPAD’s First Discovery Request to CGC, constituting 198 numbered requests. Counting subparts, CPAD has served on CGC in excess of 300 discrete requests for information.

2. CGC respects CPAD’s role in this process and its need to conduct meaningful discovery. Accordingly, CGC does not object to this initial set of 198 requests, plus subparts, to the extent the Motion is seeking approval of its ability to serve and receive responses to this First Discovery Request.

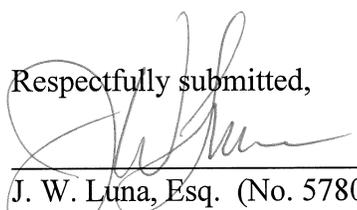
3. In not objecting to the number of requests in this First Discovery Request, the Company reserves its right to make any particular objections to specific requests that may be objectionable on other grounds (such as burdensome, overbroad, relevancy, etc., as may be applicable). CGC shall certainly work cooperatively and in good faith with the CPAD to resolve any specific objections the Company may have to individual requests in this First Discovery.

4. Further, in not objecting to the number of requests in CPAD's First Discovery Request, CGC also reserves its right to object to any future discovery requests to the extent this Motion is open ended as to the total number of requests that CPAD may serve in this matter. The Company respects that CPAD will have some legitimate follow up requests to its First Discovery Request that CGC will need to address. However, CGC objects to this Motion to the extent that this Motion is for an unlimited number of total requests.

5. In order to advance this cause, CGC hereby agrees that in any subsequent discovery request(s) CPAD may issue up to and including 40 further questions, including subparts, without objection by CGC as to the number of requests and without CPAD having to file a motion or justification for those 40 additional requests. However, to the extent CPAD seeks in excess of 40 requests, including subparts, CPAD should comply with the terms of Rule 1220-01.02.1(5)(a) and establish good cause by motion and obtain the approval of the Hearing Officer for service of such additional requests in excess of 40 in number, including subparts.

**Wherefore**, Chattanooga Gas Company advises the Hearing Office that it does not object to the number of requests being made in CPAD's First Discovery Request. At this time, the Hearing Officer may further authorize up to and including 40 additional requests, including subparts, for any subsequent discovery without any further motion or demonstration of good cause from CPAD or objection as to number by CGC up to 40, including subparts. In so authorizing such 40 additional requests, plus subparts, CPAD should be directed to file a motion and provide good cause for service of additional requests in excess of 40 in number.

Respectfully submitted,



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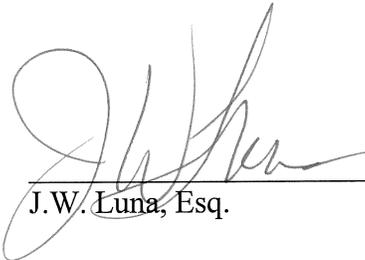
**CERTIFICATE OF SERVICE**

I hereby certify that on this 27<sup>th</sup> of March, 2018, a true and correct copy of the foregoing was served on the persons below by electronic mail:

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