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April 10, 2018

Chairman David Jones
c/o Sharla Dillon
Tennessee Public Utility Commission
502 Deaderick Street, 4th Floor
Nashville, TN 37243

Re: Chattanooga Gas Company Responses to First Round of Discovery
Requests filed by CPAD

Dear Chairman Jones:

Pursuant to the procedural schedule entered in Docket 18-00017, Chattanooga Gas Company ("CGC") is filing its responses to discovery requests propounded by the Consumer Advocate and Protective Division on March 20, 2018. Pursuant to informal discussions yesterday during breaks at the regularly scheduled TPUC conference with the Hearing Officer, Wayne Irvin and Sharla Dillon, it was agreed by the Hearing Officer given the voluminous nature of the responses to the over 300 questions, including subparts, that this filing could be made on CDs.

Therefore, included in this filing are 5 CDs containing the publicly filed responses along with General Objections and Specific Objection. An original and four copies of the attached objections are included. A separate CD is included that contains confidential information filed under seal subject to the previously entered Protective Order.

For your information, Henry Walker readily agreed to accept service by CD as well. Also, discovery requests were filed by Mr. Walker on behalf of the intervenor, Chattanooga Regional Manufacturing Association, on March 23, 2018 and Mr. Walker advised at the time that responses could be made on April 13, 2018. Chattanooga Gas Company will file their responses on or before that date.

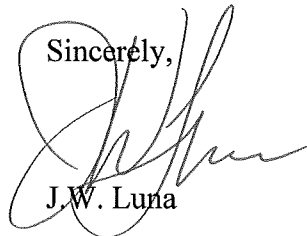
CGC appreciates this efficient, cost-effective and convenient method of making this voluminous filing. If the Commission or any party requests, we will be happy to follow up and provide a paper copy of each discovery response and those attachments

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follow up and provide a paper copy of each discovery response and those attachments that are not voluminous and not Excel. If there any questions, I look forward to receiving calls from you or others copied herein, or further directions from the Hearing Officer.

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

Sincerely,

J.W. Luna

Enclosures

cc: Monica Smith-Ashford, Esq.
Vance Broemel, Esq.
Wayne Irvin, Esq.
Henry Walker, Esq.
Floyd Self, Esq.

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

April 10, 2018

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

**CHATTANOOGA GAS COMPANY
RESPONSES AND OBJECTIONS TO
CONSUMER ADVOCATE FIRST DISCOVERY REQUESTS**

Chattanooga Gas Company (“Company” or “CGC”), pursuant to the Hearing Officer’s March 23, 2018 Order Establishing Procedural Schedule, files its Responses and Objections to the First Discovery Requests (“Responses”) of the Consumer Protection and Advocate Division of the Attorney General’s Office (“Consumer Advocate” or “CPAD”).

Because of the sheer volume of the number of requests propounded by the Consumer Advocate, in excess of 300 counting subparts, CGC has not had an opportunity to discuss any of its objections with the Consumer Advocate prior to this Response. However, CGC is committed to seeking to mutually resolve any disputes CPAD may have with CGC’s objections before they are brought to the Hearing Officer for a resolution. In that regard, notwithstanding certain of the objections, CGC has still produced some or all of the requested information. Generally, information completely objected to and not provided is limited to requests seeking information

or documents from third parties or regarding CGC's withdrawn alternative regulatory method requests.

To assist the Hearing Officer in evaluating this matter, CGC is setting forth its objections in two parts. Part I sets forth general objections applicable to CGC's discovery responses. Part II are the specific discovery request responses and, where applicable, the objections are incorporated with each such response.

I. GENERAL OBJECTIONS

1. CGC objects generally to any definitions or instructions to the extent that they are inconsistent with and request information that is beyond the scope of the Tennessee Rules of Civil Procedure. CGC's responses will comply with the requirements of the Tennessee Rules of Civil Procedure and the Rules of the Tennessee Public Utility Commission

2. Any requests for production of documents are interpreted to describe each item or category of items requested with reasonable particularity as required by Tenn. R. Civ. P. 34.02, and the terms used in the requests are not interpreted "broadly." CGC will produce non-privileged, responsive items and/or data in its possession, custody, or control as required by Tennessee Rules of Civil Procedure.

3. CGC further objects to these discovery requests to the extent they seek information that is beyond the scope of legitimate discovery in this rate case or that is subject to any privilege, including the attorney-client privilege and/or attorney work product doctrine. Without waiving any of these General Objections, the Company will respond to the CPAD's discovery requests by providing responsive, non-privileged information.

4. These General Objections are continuing and are incorporated by reference into CGC's responses to all discovery requests to the extent applicable. The statement of the following

additional objections to specific discovery requests shall not constitute a waiver of these General Objections.

5. CGC objects to the scope of the terms "identity" and "identify" as used by the CPAD. In particular, CGC objects to providing the full name, last known address, person's relationship, and other such information for persons to be identified on the grounds that the scope of information requested is overly broad and not calculated to lead to the discovery of admissible evidence. CGC further objects to the CPAD's instructions to produce documents with the type, title, subject, date, and date written on the grounds that such requests are unduly burdensome and overly broad. CGC shall reasonably identify persons and documents as relevant.

6. CGC objects to the CPAD discovery to the extent that such discovery seeks to impose an obligation on CGC to respond on behalf of subsidiaries, affiliates, or other persons that are not parties to this case on the grounds that such discovery is overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules. CGC further objects to any and all CPAD discovery that seeks to obtain information from CGC for CGC subsidiaries, affiliates, or other related CGC entities that are not parties before this Commission.

7. CGC has interpreted the CPAD discovery to apply to CGC's regulated operations in Tennessee and will limit its responses accordingly. To the extent that any CPAD discovery is intended to apply to matters that take place outside the State of Tennessee and which are not related to CGC's regulated Tennessee operations, CGC objects to such request as irrelevant, overly broad, unduly burdensome, and oppressive.

8. CGC objects to the CPAD discovery insofar as it calls for CGC to present information in a particular format or to otherwise to impose obligations on CGC which exceed the

requirements of the Tennessee Rules of Civil Procedure, except as ordered by the Hearing Officer (so Excel shall be in its native form).

9. CGC objects to the CPAD discovery that seeks to obtain “any,” “all,” “each,” or “every” document, item, customer, or other such piece of information to the extent that such discovery is overly broad and unduly burdensome. Any answers that CGC may provide in response to the CPAD discovery will be provided subject to, and without waiver of, this objection.

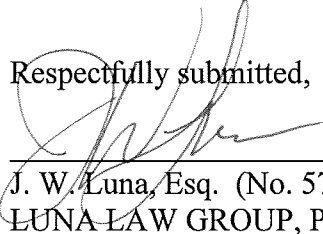
10. In the conduct of its business over time, CGC creates documents that may be stored in numerous locations and moved from site to site as employees change jobs or as the business has been transferred to new ownership or otherwise reorganized, new management installed, or other regulatory and business requirements and practices have been established. Therefore, it is possible that not every document has been identified in response to these requests. CGC has in good faith conducted a reasonable and diligent search of records that are reasonably expected to contain the requested information. To the extent that the CPAD discovery purports to require more, CGC objects on the grounds that compliance would impose an undue burden or expense.

11. CGC is providing any confidential information pursuant to the Agreed Protective Order entered by the Hearing Officer on March 13, 2018, and by marking the information as confidential.

II. SPECIFIC OBJECTIONS

Notwithstanding any of the foregoing objections, and without waiving any such objections, CGC’s specific objections appear with each response that merits an appropriate objection.

Respectfully submitted,



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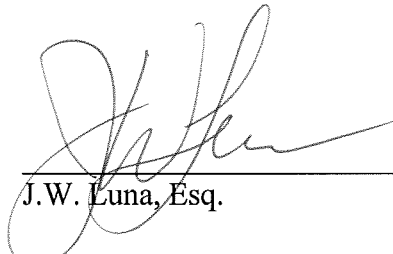
CERTIFICATE OF SERVICE

I hereby certify that on this 10th of April, 2018, a true and correct copy of the foregoing
was served on the persons below by electronic mail:

Monica Smith-Ashford
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Tennessee Public Utility Commission
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