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A PROFESSIONAL LIMITED LIABILITY COMPANY

J.W. Luna jwluna@LunaLawNashville.com

April 12, 2018

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

Re: Chattanooga Gas Company, TPUC Docket No. 18-00017

Dear Chairman Jones:

On April 10 and 11, 2018, Chattanooga Gas Company's ("CGC") filed all but one of its Responses to the first round of discovery submitted by the Consumer Advocate.

Enclosed for filing today is the final CGC response to CPAD Request 1-80, which consists of a 1-page PDF document that is the substantive response and one CD containing the attachments to the response; the attachments on the CD consist of 195 folders with 596 electronic files. Both the response and the attachments are public documents. For filing purposes, we are submitting 5 CDs. This voluminous response is being filed subject to the same General and Specific Objections filed on April 10, 2018, and incorporated herein by reference.

With this filing, CGC believes that it has in good faith answered and/or objected to all of the 198 numbered CPAD requests, in excess of 300 discrete responses. If any party determines that we have omitted a response in error, please let us know.

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

Sincerely,

J.W. Luna

Enclosures

ce: Monica Smith-Ashford, Esq.

Vance Broemel, Esq. Wayne Irvin, Esq. Henry Walker, Esq. Floyd Self, Esq.

CHATTANOOGA GAS COMPANY Docket No. 18-00017 Chattanooga Gas Company's 2018 Rate Case

Consumer Protection and Advocate Division (CPAD) Data Request Set: CPAD-1

CPAD-1-80

Question:

Refer to the Depreciation Rate Study referenced in the direct testimony of Company witness Watson. Provide a copy of the Study (including all workpapers) in Excel format with all formulas intact.

Response:

Please see Attachment CPAD-1-80 depreciation study workpapers.

Due to the voluminous nature of the information requested, the Attachment CPAD-1-80 has been submitted in electronic format only. Hard copies of Attachment CPAD-1-80 have not been submitted.

Contact Person: Dane Watson