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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:

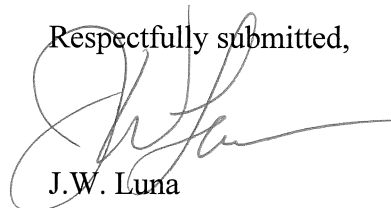
Pursuant to the procedural schedule entered in Docket 18-00017 and the agreement of counsel, Chattanooga Gas Company is filing its responses to discovery requests propounded by the Chattanooga Regional Manufactures Association on March 23, 2018.

The responses are being provided electronically on one disc that contains the confidential information and one disc that contains all the public responses that are not confidential. Therefore, enclosed for filing are five sets of CDs, for a total of ten discs. The five discs containing the confidential information are being filed under seal subject to the previously entered Protective Order.

Also attached to this filing are CGC's General Objections.

CGC appreciates this efficient, cost-effective and convenient method of making this filing. If the Commission or any party requests, we will be happy to follow up and provide a paper copy of each PDF discovery response; all the response attachments are Excel spreadsheets. If there any questions, I look forward to receiving calls from you or others copied herein, or further directions from the Hearing Officer.

Respectfully submitted,



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 12, 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**

**CHATTANOOGA GAS COMPANY
RESPONSES AND OBJECTIONS TO
CRMA FIRST DISCOVERY REQUESTS**

Chattanooga Gas Company (“Company” or “CGC”), pursuant to the Hearing Officer’s March 23, 2018 Order Establishing Procedural Schedule, and the agreement of counsel, files its Responses and Objections to the First Discovery Requests (“Responses”) of the Chattanooga Regional Manufacturers Association (“CRMA”).

Based upon the requests and CGC responses, CGC is only making general objections to the CRMA discovery requests; there are no specific objections and substantive responses are being provided to all of the CRMA discovery requests.

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 of 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 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 CRMA. 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 CRMA's instructions to produce documents with the type, title, subject, date, and date written on the grounds that such requests are is unduly burdensome and overly broad. CGC shall reasonably identify persons and documents as relevant.

6. CGC objects to the CRMA 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 CRMA 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 CRMA discovery to apply to CGC's regulated operations in Tennessee and will limit its responses accordingly. To the extent that any CRMA 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 CRMA 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 CRMA 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 CRMA discovery will be provided subject to, and without waiver of, this objection.

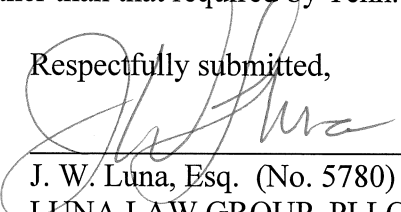
10. In the conduct of its business over time, CGC creates documents that may be stored in numerous locations and moved from site to site as employees change jobs or as the business has been transferred to new ownership or otherwise reorganized, new management

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 CRMA 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.

12. CGC objects to any discovery that seeks to impose a continuing obligation to respond or provide supplemental answers other than that required by Tenn. R. Civ. P. 26.05.

Respectfully submitted,



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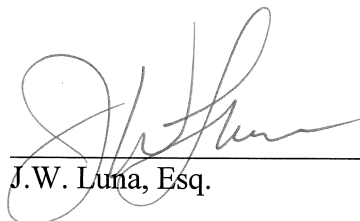
CERTIFICATE OF SERVICE

I hereby certify that on this 12th of April, 2018, a true and correct copy of the foregoing
was served on the persons below by electronic mail:

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