

A PROFESSIONAL LIMITED LIABILITY COMPANY

ATTORNEYS AT LAW

333 UNION STREET SUITE 300 NASHVILLE, TENNESSEE 37201 TELEPHONE (615) 254-9146 TELECOPIER (615) 254-7123 www.LunaLawNashville.com

J.W. Luna jwluna@LunaLawNashville.com

April 20, 2018

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

Re: Chattanooga Gas Company

TPUC Docket No. 18-00017

Dear Chairman Jones:

Chattanooga Gas Company's ("CGC") is hereby filing responses to a majority of the Consumer Protection and Advocate Division's ("CPAD") discovery requests designated by the CPAD as "Supplement to First Discovery Request". Consistent with the prior filings of discovery responses, these responses are being filed on CD.

On Friday afternoon, April 13, 2018, at approximately 3:22 p.m., CPAD served its self-styled "Supplement to First Discovery Request" consisting of approximately 158 numbered requests and over 200 separate requests counting subparts. In this filing, CGC is providing responses to 90 numbered requests. These responses are being filed subject to the same General and Specific Objections filed on April 10, 2018 and incorporated herein by reference.

CGC will provide additional responses to the Supplement to First Discovery Request informally as they are completed to the CPAD by e-mail today through Monday. CGC has a goal to have responses to the remaining 68 numbered supplemental requests formally filed in the docket by Tuesday, April 24.

As an update, since the filing of responses to the First Round of Discovery, CGC has identified a few responses with clerical errors that have been corrected and informally provided to the CPAD by e-mail. Additionally, the CPAD has requested follow-up information and further explanation to approximately 17 responses. CGC has been informally providing to the CPAD amendments to these responses. CGC will formally file those amendments and clerical corrections in the docket on Tuesday, April 24.

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

LWI Luna

Enclosures

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