

**IN THE TENNESSEE PUBLIC UTILITY COMMISSION  
AT NASHVILLE, TENNESSEE**

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

---

**FIRST SUPPLEMENT TO SECOND DISCOVERY REQUEST  
OF THE CONSUMER PROTECTION AND ADVOCATE DIVISION  
TO CHATTANOOGA GAS COMPANY**

---

To: J.W. Luna, Esq.  
Luna Law Group, PLLC  
333 Union Street, Suite 300  
Nashville, TN 37201  
jwluna@lunalawnashville.com

Floyd R. Self, Esq.  
Berger Singerman, LLP  
313 North Monroe Street, Suite 301  
Tallahassee, FL 32301  
fself@bergersingerman.com

Elizabeth Wade, Esq.  
Chief Regulatory Counsel  
Southern Company Gas  
Ten Peachtree Place, NW  
Atlanta, GA 30309  
ewade@southernco.com

Mr. Paul Leath  
Director Government, Community & Regulatory Affairs  
Chattanooga Gas Company  
2207 Olan Mills Drive  
Chattanooga, TN 37421  
pleath@southernco.com

This First Supplement to Second Discovery Requests is hereby served upon Chattanooga Gas Company pursuant to Rules 26, 33, 34 and 36 of the Tennessee Rules of Civil Procedure and Tenn. Comp. R. & Reg. 1220-1-2-.11. The Consumer Protection and Advocate Division of the Attorney General's Office (Consumer Advocate) requests that full and complete responses be provided pursuant to the Tennessee Rules of Civil Procedure. The responses are to be produced at the Office of the Tennessee Attorney General and Reporter, Consumer Protection and Advocate Division, 315 Deaderick Street, 20<sup>th</sup> Floor, Nashville, Tennessee 37243, c/o Wayne M. Irvin, on or before 4:00 p.m. (CDT), May 21, 2018, or at such other time as may be ordered by the Hearing Officer in the adoption or approval of a procedural schedule in this TPUC Docket.

#### **PRELIMINARY MATTERS AND DEFINITIONS**

These additional discovery requests incorporate the same Preliminary Matters and Definitions set forth in the *First Discovery Request of the Consumer Protection and Advocate Division to Tennessee Chattanooga Gas Company* filed March 20, 2018, and are to be considered continuing in nature, and are to be supplemented from time to time as information is received by CGC and any CGC affiliate which would make a prior response inaccurate, incomplete, or incorrect. Further, to the extent that some responses may contain confidential information, clearly and conspicuously mark those responses that CGC asserts are confidential and separate these responses from the public filing. CGC shall also comply with any other requirements in the Protective Order.

In addition, the Consumer Advocate reserves the right to supplement this First Supplement to Second Discovery Requests with additional requests based on incomplete, ambiguous, or late-filed responses by CGC to the Consumer Advocate.

## **FIRST SUPPLEMENT TO SECOND DISCOVERY REQUESTS**

- 2-74 Refer to the Company's response to CPAD 2-1. Specifically, refer to Attachments CPAD 2-1a through 2-1g regarding the support for new meters.
- a. Provide a legend that defines the "Rate Codes" contained in "Column A" of the "Res Summary" and "Com Summary" tabs of these spreadsheets.
  - b. Identify the source of the information contained on the "Chat Res" and "Chat Com" tabs of these spreadsheets. Specifically, does this data come from regular internal reports of the Company or is it just pulled together for this request? If this data comes from regular internal reports of the Company, provide the internal reports containing this data.

### **RESPONSE:**

- 2-75 Refer to the Company's response to CPAD 2-17. Specifically, refer to Attachment CPAD 2-17a CONFIDENTIAL regarding support for the therm billing conversion from volumetric meter readings. Identify the source of the information contained on the "Dec 2017 Industrial Consumption" tab of this spreadsheet. Specifically, does this data come from regular internal reports of the Company or is it just pulled together for this request? If this data comes from regular internal reports of the Company, provide the internal reports containing this data.

### **RESPONSE:**

- 2-76 Refer to the Company's response to CPAD 2-17. Specifically, refer to Attachment CPAD 2-17b regarding support for the therm billing conversion from volumetric meter readings. Identify the source of the information contained on the "Data" tab of this spreadsheet. Specifically, does this data come from regular internal reports of the Company or is it just pulled together for this request? If this data comes from regular internal reports of the Company, provide the internal reports containing this data.

### **RESPONSE:**

2-77 Refer to the Company's response to CPAD 2-18 regarding the detail supporting Account 402300 – LNG Sales in the Company's trial balance contained in CPAD 1-2. We are unable to readily tie the amounts included in the Company's response to the Company's trial balance. Provide a narrative explanation of how the amounts contained in the Attachments to CPAD 2-18 tie to the amounts recorded on the trial balance. In addition, provide a copy of the trial balance for any affiliates that are recording components of LNG sales transactions.

**RESPONSE:**

2-78 Refer to the Company's response to CPAD 1-19. Provide the Other Revenue determinants and recorded amounts by month from January 2010 through December 2017 in the following categories:

- a. Reconnect Charges – Firm.
- b. Seasonal Reconnect Charges.
- c. Turn-On Charges.
- d. Meter Set Charges.
- e. Returned Check Charges.
- f. Non-Metered Gas Light Charges.
- g. Unauthorized or Excess Gas Use Charges (by tariff).
- h. All other miscellaneous revenues.

**RESPONSE:**

2-79 Refer to the spreadsheet included as the "Rate Case Revenue Model" with the Company's response to MFG 25 regarding revenue workpapers. Specifically refer to Rows 113 and 114 of the "Attrition Year" tab of this spreadsheet regarding Damage Billing for Mains and Services.

- a. Identify the account where the Company records Damage Billing revenue for Mains and Services. Specifically, provide a reference and narrative locating any accounts related to Damage Billing revenue in the Company's trial balance provided in CPAD 1-2a.
- b. Describe the Company's accounting procedures for recording receipts from Damage Billing. Specifically, explain whether these receipts are recorded to revenues or as a credit to utility plant.

**RESPONSE:**

2-80 Refer to the spreadsheet included with the Company's response to CPAD-2-29ax CONFIDENTIAL regarding billing and capacity demand determinants. The narrative of the Company's response indicates that this spreadsheet includes data from January 2014 through November 2017. However, it appears that this response only includes data through July 2017. Provide the missing data from August 2017 through November 2017.

**RESPONSE:**

2-81 Refer to the spreadsheet included with the Company's response to CPAD-2-29a CONFIDENTIAL regarding billing and capacity demand determinants for Rate Class C-2. Provide a narrative description of the contents for each column of this spreadsheet.

**RESPONSE:**

RESPECTFULLY SUBMITTED,



---

WAYNE M. IRVIN (BPR No. 30946)  
Assistant Attorney General  
DANIEL P. WHITAKER, III (BPR No. 035410)  
Assistant Attorney General  
Office of the Tennessee Attorney General  
Public Protection Section  
Consumer Protection and Advocate Division  
P.O. Box 20207  
Nashville, Tennessee 37202-0207  
(615) 741-8733

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served via U.S. Mail or electronic mail upon:

J.W. Luna, Esq.  
Luna Law Group, PLLC  
333 Union Street, Suite 300  
Nashville, TN 37201  
jwluna@lunalawnashville.com

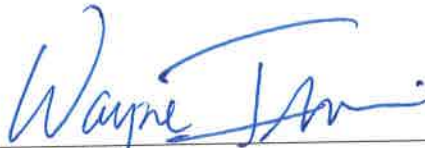
Floyd R. Self, Esq.  
Berger Singerman, LLP  
313 North Monroe Street, Suite 301  
Tallahassee, FL 32301  
fself@bergersingerman.com

Elizabeth Wade, Esq.  
Chief Regulatory Counsel  
Southern Company Gas  
Ten Peachtree Place, NW  
Atlanta, GA 30309  
ewade@southernco.com

Mr. Paul Leath  
Director Government, Community & Regulatory Affairs  
Chattanooga Gas Company  
2207 Olan Mills Drive  
Chattanooga, TN 37421  
pleath@southernco.com

Henry M. Walker, Esq.  
Bradley Arant Boult Cummings LLP  
1600 Division Street, Suite 700  
Nashville, TN 37203  
hwalker@bradley.com

This the 16<sup>th</sup> day of May, 2018.

  
\_\_\_\_\_  
Wayne M. Irvin