

**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-1-177**

Question:

Provide the actual capital structure and cost rates on short term debt, long term debt, preferred stock, and common equity for each of the twelve months ending June 30, 2015, 2016, and 2017 for:

- (a) Chattanooga Gas Company, subsidiary only.
- (b) AGL Resources, Inc., parent only.
- (c) AGL Resources, Inc., consolidated.
- (d) Southern Company Gas, consolidated.
- (e) Southern Company Gas, parent only.
- (f) Southern Company, consolidated.
- (g) Southern Company, parent only.

Include in your response all supporting source documentation, work papers, and calculations.

Response:

(a)-(e)

See Attachments CPAD-1-177a through CPAD-1-177f for the capital structures for Chattanooga Gas Company, AGL Resources, Inc., parent only and Southern Company Gas, parent only. For the capital structure and debt costs, please refer to Southern Company Gas consolidated basis in Attachment CPAD-1-177g.

- For the capital structure for Chattanooga Gas Company, please see Attachments CPAD-1-177a, b, and c for years 2015, 2016, and 2017, respectively.
- For the capital structure for AGL Resources, Inc., parent only and Southern Company Gas, parent only see CONFIDENTIAL Attachments CPAD-1- 177d, e, and f for years 2015, 2016, and 2017, respectively.
- For the capital structure for AGL Resources, Inc., consolidated and Southern Company Gas, consolidated see Attachment CPAD-1-177g for years 2015, 2016, and 2017.

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(f) & (g) The Company's financing is provided by AGL Resources, Inc. consolidated (prior to July 1, 2016) and Southern Company Gas, consolidated (since July 1, 2016). Therefore, Southern Company consolidated and parent only are not the appropriate level for the determination of the cost of capital for Chattanooga Gas Company in this proceeding.

Updated Response (May 21, 2018):

See CPAD-1-177h Attachment for the Southern Company Consolidated and Southern Company Parent capital structure and cost rates for the periods requested.

Contact Person: Gary Tucker

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**CPAD-1-178**

Question:

Provide the forecasted capital structure and cost rates on short term debt, long term debt, preferred stock, and common equity for the attrition year ending June 30, 2019, for:

- (a) Chattanooga Gas Company, subsidiary only.
- (b) AGL Resources, Inc., parent only.
- (c) AGL Resources, Inc., consolidated
- (d) Southern Company Gas, consolidated.
- (e) Southern Company Gas, parent only.
- (f) Southern Company, consolidated.
- (g) Southern Company, parent only.

Include in your response all supporting source documentation, work papers, and calculations.

Revised Response (May 21, 2018):

CGC objects to this request in that it seeks information and/or documents from other entities that are not within CGC's possession, custody, or control. Moreover, this request is not reasonably calculated to lead to the discovery of admissible evidence nor is the subject matter of the request relevant to the subject matter of this action as set forth in the Petition to the extent this request is seeking projected or forecasted capital structure and costs associated with Southern Company Parent and Southern Company Consolidated. Notwithstanding the foregoing and without waiving its objections, CGC states:

(a) & (b) Chattanooga Gas Company and AGL Resources, Inc. parent only/Southern Company Gas parent only forecasts of capital structure and cost of debt are not available. The Company only forecasts capital structure and cost of debt on an AGL Resources, Inc./Southern Company Gas consolidated basis.

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(c) & (d) See CGC TPUC MFG Item 81–1 through 6. In this MFG, the Company provides the forecasted capital structure and cost of debt based on AGL Resources, Inc. consolidated/Southern Company Gas consolidated.

(e), (f), & (g) The Company's financing is provided by AGL Resources, Inc. consolidated (prior to July 1, 2016) and Southern Company Gas, consolidated (since July 1, 2016). Therefore, Southern Company, consolidated and parent only are not the appropriate level for the determination of the cost of capital for Chattanooga Gas Company in this proceeding.

Contact Person: Gary Tucker; objection provided by Counsel.