

**BEFORE THE TENNESSEE PUBLIC UTILITY COMMISSION
NASHVILLE, TENNESSEE**

February 15, 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**

**DIRECT TESTIMONY OF

RACHEL D. JOHNSON

ON BEHALF OF

CHATTANOOGA GAS COMPANY**

1 **Q. Please state your name, position and address.**

2 A. Rachel Johnson, Director, Regulatory Accounting and Revenue Recovery
3 Mechanisms, Southern Company Gas (“SCG”). My business address is Ten
4 Peachtree Place, Location 1686, Atlanta, Georgia 30309.

5 **Q. Please describe your professional background and education.**

6 A. I received a Bachelor of Science in Accounting from Nova Southeastern
7 University in 1992 and a Master of Taxation from University of Denver in 1994.
8 Upon graduation, I held several tax positions in the state of Colorado. In 2003, I
9 moved to the state of Georgia and continued to work in the tax field. In 2008, I
10 was hired as the Income Tax Manager for AGL Resources and was promoted to
11 the Tax Director in 2012. In the tax roles, my responsibilities included: (1) tax
12 provisions, (2) separate and consolidated tax returns, (3) international and US
13 taxation, (4) local and federal audits, and (5) supervision of the income tax
14 department. In 2016, I transferred into the Regulatory Department. In this
15 position, I am responsible for the review of various regulatory filings, Sarbanes-
16 Oxley controls, preparation, review, and management of rate case documentation
17 for various jurisdictions.

18 **Q. Have you previously submitted testimony before the Tennessee Regulatory**
19 **Authority or any other regulatory commission?**

20 A. No. I have not submitted testimony to any regulatory commission.

21 **Q. What is the purpose of your testimony?**

22 A. I will present various financial and accounting data in support of Chattanooga Gas
23 Company’s (“CGC” or the “Company”) proposed rate increase of \$7.0 million in

1 this proceeding, including (A) the proposed revenue adjustment required, (B)
2 CGC's cost of service, (C) the determination of rate base, and (D) the capital
3 structure and cost of debt financing.

4 **Q. Please explain the historic test period and the attrition period used in**
5 **preparation of the Company's case?**

6 A. The Company's historic test period is the twelve months ended June 30, 2017.
7 This period represented the most recent time period for which public financial
8 data was available when the Company began preparing its case. The attrition
9 period for which the Company's estimated revenue requirement is based on is the
10 12 months ending June 30, 2019, which represents forecast amounts for the
11 twelve months succeeding July 1, 2018. New rates are expected to be
12 implemented September 1, 2018. Additionally, please note that due to the tax
13 legislation passed December 22, 2017, filing guideline schedules and responses
14 have been updated through December 31, 2017, where applicable.

15 **Q. Please identify the Minimum Filing Guidelines ("MFG") Schedules that you**
16 **will be sponsoring.**

17 A. In preparing the rate case filing, we utilized the minimum filing guidelines
18 ("MFGs") that are available on the TPUC website. While the Commission has
19 not formally adopted minimum filing requirements, CGC has utilized these MFGs
20 in preparation of the case as the Company did in its last rate case in 2009-2010,
21 Docket No. 09-00183.

22 The specific MFGs that I will be supporting are the following with
23 exceptions noted:

- General schedules #14-28.
- Expense schedules #42-59 (except for #55 which relates to the cost of service study and supported by witness Daniel Yardley).
- Tax schedules #60-63.
- Rate base schedules #64-71 and are outlined in more detail in this document.
- Working capital schedules #72-74 (except for #72 which relates to the lead lag study and supported by witness Michael Adams).
- Merchandise & Jobbing and other non-regulated operations schedules #75-78.
- Cost of capital schedules #79-99.

Q. Are you sponsoring exhibits in connection with your testimony?

A. Yes. I am sponsoring the following exhibits in support of CGC's base revenue requirement for the twelve month attrition period ending June 30, 2019:

- Exhibit RDJ-1 – CGC's Statement of Income before and after the proposed rate adjustment and calculations of the proposed base revenue adjustment, base revenue conversion factor and Tennessee excise and federal income taxes. Please refer to MFG 25 as it will provide the support for the operating income calculation.
- Exhibit RDJ-2 – The elements of estimated average rate base, working capital requirement, and lead lag requirement after revenue adjustment as of June 30, 2019. Please refer to MFG 69 for support of these components.

- Exhibit RDJ-3 – A summary of the Company’s estimated cost of capital as of June 30, 2019. Please refer to MFG 81 for the calculation of the cost of capital.

Q. Were these exhibits and related schedules prepared by you or under your direction and supervision?

A. Yes.

Q. Has the Company incorporated the impacts of the newly adopted Tax Cuts and Jobs Act (“the Act”)?

A. Yes. The Company has incorporated all known and measurable impacts that the Act will have on the Company’s financial condition. These impacts include the following:

- Federal income tax rate of 21%.
- Establishment of a regulatory liability for the recalculation of accumulated deferred income taxes at the federal tax rate of 21%. This is also referred to as excess deferred income taxes (“EDIT”) and included on Exhibit RDJ 2-1, line 7.
- Amortization of protected EDIT and basis adjustments to property using the average rate adjustment mechanism (“ARAM”) and unprotected EDIT using a five year straight line method included in MFG 61-2, line 27 for federal and state purposes.
- Elimination of bonus depreciation in 2018 with the exception of property acquired prior to September 30, 2017, and placed in service in 2018.

- Incorporation of a higher equity ratio at Southern Company Gas to mitigate the effects of reduced cash flows due to the elimination of bonus depreciation and flow back of EDIT to customers, which in turn has an adverse impact on Southern Company Gas' credit metrics.

I. CALCULATION OF REVENUE REQUIREMENT

Q. Please summarize the information contained in Exhibit RDJ-1, supporting the Company's calculated base revenue requirement?

A. Schedule 1 reflects the attrition period base revenue deficiency and proposed rate adjustment necessary to allow the Company the opportunity to earn a fair and reasonable return on its investment. Column 1 provides an income statement for the attrition period per books; Column 2 provides the Company's proposed rate adjustment; and Column 3 provides an income statement for the attrition period after the Company's proposed rate adjustment. Additionally, Line 15 of Schedule 1 includes the calculated rate of return of 4.61% before the proposed rate adjustment. Schedule 2 of Exhibit RDJ-1 provides the calculation of the proposed base revenue adjustment in the amount of \$7.0 required for the Company's proposed rate of return of 7.83%. This calculation is based on the Company's anticipated gross revenue conversion factor, as calculated on Schedule 2 of Exhibit RDJ-1. Schedule 3 of the Exhibit provides the calculation of the Tennessee excise and federal income taxes before and after the proposed rate adjustment.

Q. Please summarize the primary components of the proposed revenue adjustment?

1 A. The primary components of base rates are detailed in the RDJ exhibits and
2 summarized below:

- 3 • Increase in operating revenue (\$3 million)
- 4 • Increase in cost of capital \$1 million
- 5 • Increase in rate base \$6 million
- 6 • Increase in cost of service \$5 million
- 7 • Decrease in income tax (\$2 million)

8 **(a). Income Statement.**

9 **Q. Please explain in detail how you developed the forecasted operating income**
10 **for the attrition period contained in Schedule 1 of Exhibit RDJ-1, column 1.**

11 A. Revenues

12 The first component of the forecasted operating income is Operating Revenues.
13 The forecast of Operating Revenues, Gas Cost and Other Revenues for the
14 attrition period is provided in the direct testimony of Heath Brooks. Allowance
15 for Funds Used during Construction (“AFUDC”) was forecast by multiplying the
16 forecasted balance of Construction Work in Progress (“CWIP”) for the attrition
17 period by the proposed weighted average cost of capital (“WACC”) for the
18 attrition period. The estimated balance of CWIP is based on the 13 month
19 average CWIP for the attrition year.

20 **(b). Operation and Maintenance Expenses.**

21 **Q. How did you forecast operations and maintenance expense for the attrition**
22 **period?**

1 A. The Company based its attrition period expense forecast for July 1, 2018-
2 December 31, 2018 on the Company's annual 2018 budget, please refer to MFG
3 68 for a description of the budget process. The Company uses a zero based
4 budget approach and considers this to be the best estimate of expenses for the first
5 half of the attrition period. The 2019 portion for the attrition period expenses is
6 based on known changes or applied growth rate deemed appropriate for that
7 expense category. The forecasts of some of the major expense components are
8 based on specific expense forecasts while others are based upon a general
9 expected percentage increase.

10 **(c). O&M Expense Specifically Forecast.**

11 **Payroll Expense**

12 **Q. Please identify and explain the forecast for payroll expense.**

13 A. The payroll forecast is comprised of two components – fixed compensation and
14 variable compensation. Fixed compensation includes base pay and after normal
15 hours pay (overtime, beeper pay, etc.); and variable compensation primarily
16 includes the Company's Pay for Performance Plan ("PPP"), Long Term Incentive
17 Plan ("LTI") compensation plans, and service awards.

18 **Q. How did you determine the forecast for fixed compensation?**

19 A. Fixed compensation was forecast based on the 2018 Budget amount multiplied by
20 the average annual merit increase of 3%. These amounts incorporate estimate
21 increases in costs associated with the workforce initiatives discussed in the
22 testimony of Wendell Dallas.

23 **Q. How did the Company forecast variable compensation?**

1 A. The estimated attrition period cost for variable compensation was determined
2 using the 2018 Budget amount multiplied by 3% which is the average merit
3 increase. The allocation between O&M and capital is based on the payroll
4 capitalization percentages calculated for the 2018 budget.

5 **(d). Bad Debt Expense.**

6 **Q. Please explain how you estimated bad debt expense.**

7 A. Bad debt expense was estimated based on CGC's actual write-off experience for
8 the 24 months ended December 2017. The actual write-off percentage includes
9 only the non-gas portion of customers' bills since the gas portion is recovered
10 through the Company's purchased gas adjustment. The percentage was then
11 applied to the estimated margin, excluding revenues for recovery of damages to
12 the distribution system.

13 **(e). Employee Benefits Expense.**

14 **Q. What are the components of employee benefits expense included in the**
15 **attrition period?**

16 A. Employee benefits expense in the attrition period includes costs associated with
17 401(k) benefits, group health benefits, pension expense, post-retirement benefits
18 other than pensions.

19 **Q. How did the Company estimate 401(k) benefits costs?**

20 A. 401K benefits were forecast based on the 2018 Budget amount multiplied by the
21 average annual merit increase of 3%.

22 **Q. Please describe how group health and other benefits were calculated.**

1 A. Group health benefits were based on the recent collection of data for medical,
2 prescription drug, and behavioral health claims. Historical trends, estimated
3 changes to enrollment, plan design changes, and administrative costs were
4 considered when developing future estimates.

5 **Q. How did you estimate pension and post-retirement expenses for the attrition**
6 **period?**

7 A. The Company's pension and post retirement plans are based on an estimate
8 provided by Mercer, the Company's actuary. The total expense amount was
9 estimated in accordance with Statement of Financial Accounting Standards for
10 Postretirement Benefits Other Than Pensions.

11 **(f). Expenses Based on the General Growth Percentage.**

12 **Q. Please identify and explain the forecast of each element of O&M based on the**
13 **general growth percentage.**

14 A. The general growth percentage is the estimated change in the consumer price
15 index from the end of test period through the end of the attrition period and
16 provided in detail on MFG 43. All expense categories were forecast using the
17 general growth percentage except for fixed and variable compensation, benefits,
18 intercompany billing, and AGL Services Company ("AGSC") allocation amounts
19 which are based on the 2018 budget and increased by 3% for the six months
20 January – June 2019.

21 **(g). Depreciation and Amortization Expense.**

22 **Q. Please describe your forecast of depreciation and amortization expense.**

1 A. Depreciation and amortization expense was estimated using the composite
2 depreciation rates resulting from a deprecation study as proposed in the direct
3 testimony of Mr. Dane Watson and the estimated average utility plant in service
4 for the attrition period. Depreciation also includes an allocated amount of
5 depreciation expense from AGSC which is based upon December 2017 allocation
6 factors.

7 **(h). Taxes Other Than Income.**

8 **Q. Please identify and explain the forecast of each element of taxes other than**
9 **income.**

10 A. Taxes other than income include property, gross receipts, and net worth tax as
11 well as payroll taxes and allocated taxes other than income. As with depreciation
12 expense a portion of AGSC allocated costs for both the attrition period and the
13 test period are assigned to taxes other than income.

14 **Q. How did the Company estimate its attrition period franchise and payroll**
15 **taxes?**

16 A. Franchise and payroll tax expense calculation utilized estimates based upon the
17 Budget year activity and then applied growth percentages of CPI and 3% (as
18 related to the average annual merit increase), respectively for each tax.

19 **II. DETERMINATION OF RATE BASE**

20 **Q. Would you summarize the information contained in Exhibit RDJ-2, Schedule**
21 **1 supporting the Company's calculation of base revenue requirement?**

22 A. Exhibit RDJ-2, Schedule 1 summarizes the attrition period forecast of the
23 Company's rate base, which includes plant in service, CWIP, pensions,

1 postretirement benefits other than pensions (“PBOP”), working capital, and
2 certain deductions from rate base. The forecasted attrition period rate base is
3 \$159.9 million. The forecast is based on a 13 month average, which normalizes
4 rate base over the attrition period and takes into account any fluctuations during
5 the attrition period.

6 **Q. Please summarize the change between the test period and the attrition period**
7 **average rate base.**

8 A. The primary differences between the test period and attrition periods can be
9 attributed to the following:

- 10 • Utility Plant in Service (including CWIP) \$42 million
- 11 • Pension \$6 million
- 12 • Working Capital & Materials \$5 million
- 13 • Accumulated Depreciation (\$8 million)
- 14 • Accumulated Deferred Inc. Tax \$18 million
- 15 • Excess Deferred (\$21 million)

16 **(a). Utility Plant and CWIP.**

17 **Q. Please describe how you calculated the forecast of Utility Plant in Service and**
18 **CWIP.**

19 A. MFG 69 provides for the estimated average balance of utility plant in service for
20 the attrition period of \$301.4 million and was calculated starting with the actual
21 balance as of June 30, 2017 and subsequently updated for actual balances to
22 December 31, 2017. Additions for January 2018 through December 2018 are
23 based on the Company’s budget for 2018. Additions for January 2019 through

1 June 2019 are based on a forecast specifically prepared for this proceeding.
2 Estimated retirements of plant are based on the average retirements for the four
3 years ended June 2017. MFG 69 provides for the estimated average balance of
4 CWIP for the attrition period of \$11 million and is based on the 13 month average
5 balance as of the attrition period utilizing capital expenditures and in-service
6 additions during 2018 and 2019.

7 The Company has also included in utility plant and CWIP an allocated
8 portion of AGSC attrition period forecasted average utility plant and CWIP. The
9 forecast of AGSC utility plant is based on a combination of forecasts and
10 preliminary budget data from the end of the test year through the attrition period
11 and an estimate of retirements based on historic experience. The forecast of
12 AGSC CWIP is based on the 13 month average balance as of the attrition period
13 utilizing capital expenditures and in-service additions.

14 The forecasted balance of AGSC attrition period utility plant and CWIP
15 allocated to CGC is based on the ratio of AGSC expenses allocated to CGC to
16 total AGSC expenses allocated to all AGSC affiliates. This ratio is 1.9% and can
17 be supported by calculations found in MFG 71. Allocation of rate base items
18 from AGSC is necessary to reflect the investment made by AGSC in providing
19 services to CGC.

20 **(b). Pension and Post-Retirement Assets.**

21 **Q. Please describe the pension and post-retirement assets and how it was**
22 **calculated**

1 A. The pension and post-retirement asset amounts are based on statements provided
2 by Mercer, the Company's actuary and included with MFG 50.

3 **Q. Is this the Company proposing a change to how pension expense and the**
4 **associated rate base is treated in this case?**

5 A. Yes. The Company is proposing to recover pension expense in accordance with
6 generally accepted accounting principles ("GAAP"). This is consistent with the
7 manner in which the company recovers OPEB expense and provides a consistent
8 method of recording expense for both GAAP and ratemaking purposes.

9 **(c). Working Capital Requirement.**

10 **Q. Please explain the components of the working capital requirement and how**
11 **each component was calculated.**

12 A. The components of the estimated working capital requirement for the attrition
13 period are included in Schedules 2 and 3 of Exhibit RDJ-2 and were calculated as
14 follows:

15 **(d). Requirement for Lead-lag.**

16 The requirement for lead lag was calculated based on the lead lag study as
17 proposed in the direct testimony of Mr. Michael Adams. There have been no
18 significant changes to the Company's operations that would materially impact the
19 lead lag study. The calculation of the requirement for lead lag is provided in
20 Exhibit RDJ-2, Schedule 3 and supported by MFG 72.

21 **(e). Materials and Supplies.**

1 This calculation is based upon a 13-month average for the test period, June 2016
2 through June 2017. The use of a 13 month average allows for the reflection of
3 any seasonality of these accounts.

4 **(f). Stored Gas Inventory.**

5 The starting point for the calculation of average stored gas inventory was the
6 actual volumes and dollar amounts of inventory as of December 31, 2017. These
7 balances were then projected monthly as follows: From January 2018 through
8 June 2019, injections were forecast based on the Company's current injection
9 schedule, ratably April through October for two of the underground storages,
10 Firm Storage Production Area or FSPA and Firm Storage Market Area or FSMA,
11 and liquefied natural gas storage and May through September for Contract
12 Storage Service or CSS, the third underground storage. Injection volumes in each
13 year are based on the Company's March 31st ending balance and the targeted
14 storage levels entering the winter season. Injections are forecast and managed by
15 AGSC's Gas Supply Group. Withdrawals were forecasted based on the estimated
16 need to utilize stored gas inventory during the winter season while maintaining an
17 adequate level of storage to mitigate any unseen circumstances or events.
18 Withdrawals are also forecast and managed by AGSC's Gas Supply Group.

19 Pricing for the injections was calculated using the NYMEX futures price
20 for natural gas as of October 21, 2017 plus the variable costs incurred to inject the
21 gas into the Company's storage facilities. Pricing for the withdrawals was
22 calculated using the monthly weighted average cost of gas, which was re-
23 calculated each month based on the applicable withdrawals, injections and

1 NYMEX futures price. Additionally, the cost of liquefaction is included in the
2 calculation for the LNG storage facility. The thirteen month average for the
3 attrition period (June 2018 through June 2019) was then calculated using the
4 monthly projected balances of the stored gas inventory.

5 **(g). Deferred Rate Case Costs.**

6 The deferred rate case costs included in MFG 58 represent the estimated external
7 costs that have been or will be incurred in this case including legal, depreciation
8 study, class cost of service, and cost of equity.

9 **(h). Reserve for Uncollectible Accounts.**

10 MFG 69 provides details regarding the average reserve for uncollectible accounts.
11 The average reserve was calculated using the ratio of the average historical
12 reserve balance from January 2016 through December 2017 to the average
13 historical operating margin for the same period. This ratio was then applied to the
14 estimated operating margin for the attrition period.

15 **(i). Customer Deposits and Related Accrued Interest.**

16 Customer deposits are based on the December 2017 13-month average balance,
17 adjusted for the most recent 3-year average growth rate. Accrued interest on
18 customer deposits for the attrition period was based on actual amounts for the
19 period ended December 2017. Support for both calculations are provided for on
20 MFG 69.

21 **(j). Accumulated Depreciation.**

22 MFG 69 provides support for accumulated depreciation. Accumulated
23 depreciation is estimated to be \$127.9 million for the attrition period. The

1 balance of accumulated provision for depreciation was calculated starting with the
2 actual balance as of December 31, 2017. This balance was then projected through
3 the end of the attrition period by adding estimated depreciation expense and
4 subtracting estimated plant retirements and the net cost of removal. Depreciation
5 expense for January 2018 through June 2018 was calculated by multiplying the
6 average plant balances during those time periods by the currently authorized rates.
7 Depreciation expense for July 2018 through June 2019 was calculated by
8 multiplying the average plant balance for the 13 months ending June 2019 by the
9 proposed depreciation rates from the depreciation study supported by the direct
10 testimony of Mr. Watson.

11 **(k). Accumulated Deferred Income Tax.**

12 ADIT was calculated using the account balances as of December 31, 2017, and
13 then projecting through June 2019 for changes to the components of the
14 accumulated deferred income tax balances. The primary component of the ADIT
15 projection is the increase due to the difference in tax depreciation and book
16 depreciation through the end of the attrition period. Tax and book depreciation
17 were estimated based on the existing property balances and estimated changes to
18 those balances. The difference multiplied by the income tax rates results in the
19 change in ADIT. The Company also estimated other ADIT items either based on
20 specific forecasts or historic experience.

21 As discussed previously in my testimony and included with MFG 69 , the
22 effect of the newly adopted Tax Cuts and Jobs Act has also been incorporated in
23 the determination of ADIT. The tax depreciation calculation includes Modified

1 Accelerated Cost Recovery System (“MACRS”) rates for years 2018 and 2019
2 without bonus depreciation, with the exception of \$3.6 million of assets acquired
3 during Q4 2017 and expected to be placed in service during the Q1 2018 that
4 qualify for bonus depreciation. The regulatory liability associated with the
5 Company’s EDIT is also included as a component of ADIT and included in
6 Exhibit RDJ 2-1, line 7. The Calculation of the amortization of the EDIT is
7 included in MFG 61-2, line 27.

8 **(I). Contributions in Aid of Construction and Customer Advances for**
9 **Construction.**

10 Consistent with the Federal Energy Regulatory Commission System of Accounts,
11 the Company includes contributions in aid of construction (“CIAC”) as a
12 reduction to plant balances and net with CWIP. As a result of the purchase of
13 Power Plan, CIAC activity is no longer tracked in separate accounts but instead
14 net with the assets as a part of CWIP included on Exhibit RDJ, Schedule 1.
15 Additionally, The Company does not expect a change to customer advances for
16 construction.

17 **III. COST OF CAPITAL**

18 **Q. Would you summarize the information contained in Exhibit RDJ-3, Schedule 1**
19 **supporting the Company’s Cost of Capital?**

20 A. Exhibit RDJ-3, Schedule 1 is the Summary of Estimated Cost of Capital as of June
21 30, 2019. Column 1 provides the capitalization ratios of each component of the
22 capital structure. Column 2 provides the cost of each component of capital, both
23 supported by MFG 81, and column 3 provides the weighted average cost of capital.

1 **Q. Would you explain how you calculated the proposed capital structure?**

2 A. The Company's proposed capital structure is 44.47% long-term debt, 6.30% short-
3 term debt and 49.23% equity. The calculations are shown on Exhibit RDJ-3,
4 Schedule 1 and based on the consolidated capital structure of Southern Company
5 Gas adjusted for non-ratemaking components such as other comprehensive
6 income and the impact of the acquisition by Southern Company.

7 **Q. How did the newly adopted Tax Cuts and Jobs Act impact the capitalization**
8 **ratios of Southern Company Gas?**

9 A. One of the key credit metrics used by ratings agencies to analyze and assess the
10 credit worthiness of companies is the ratio of funds from operations ("FFO") to
11 total debt. One of the items included in FFO is the cash flow impact of deferred
12 income taxes. Under previous tax law, bonus depreciation was allowed at 40% in
13 2018 and 30% in 2019. This provided for immediate depreciation of plant placed
14 in service in 2018 and 2019 at 40% and 30%, respectively of the basis of the plant
15 asset. This provided additional cash in-flows with a corresponding increase to
16 ADIT. The effect of the elimination of bonus depreciation in the Act is to
17 decrease FFO thereby reducing the FFO to total debt ratio. Long-term
18 deterioration of the FFO to total debt ratio would result in a downgrade in credit
19 ratings for Southern Company Gas resulting in higher debt costs for Southern
20 Company Gas and ultimately customers. To mitigate the impact of the Act on
21 Southern Company Gas' credit rating, Southern Company Gas will begin
22 increasing its equity component of the capital structure. This will reduce the long-

1 term debt component and allow Southern Company Gas to maintain its strong
2 credit ratings.

3 **Q. How did the Company determine the cost of short-term debt?**

4 A. The estimated cost of short-term debt is based on Southern Company Gas'
5 projected short-term debt cost of its commercial paper program and credit facility.
6 The projected short-term debt cost includes the monthly average of the forward
7 curve for the 30-day London Inter-Bank Offering Rate ("LIBOR") from
8 September 2017-December 2018, plus the estimated spread between LIBOR and
9 the commercial paper rate and the estimated costs associated with Southern
10 Company Gas's credit facility and other short-term debt related costs.

11 **Q. How did the Company determine the cost of long-term debt?**

12 A. The cost of long-term debt includes the cost of senior notes, medium-term notes,
13 and revenue bonds within the consolidated debt structure of Southern Company
14 Gas, excluding Northern Illinois Gas Company d/b/a Nicor Gas Company
15 ("Nicor") for the reason that Nicor issues its own long and short term debt. The
16 Company calculated the cost projection using actual interest rates and monthly
17 amortization of debt costs, as well as forecasted debt issuances expected to be
18 made during the period January 1, 2018-June 30, 2019.

19 **Q. How was the cost of common equity determined?**

20 A. The calculation of the cost of common equity of 11.25% is discussed in the pre-filed
21 direct testimony of Dr. James Vander Weide.

22 **Q. Does this conclude your direct testimony?**

23 A. Yes.

| | A | B | C | D | E | F |
|----|-------------|---|--|---------------|-----|---|
| 1 | | | Chattanooga Gas Company | | | |
| 2 | | | Revenue Adjustment Calculation | | | |
| 3 | | | For the Twelve Months Ending June 30, 2019 (Attrition Period) | | | |
| 4 | | | | | | |
| 5 | Line | | | | | |
| 6 | No. | | | Amount | | |
| 7 | | | | | | |
| 8 | 1 | | Rate Base | \$159,856,710 | (A) | |
| 9 | 2 | | Operating Income at Present Rates | 7,364,092 | (B) | |
| 10 | 3 | | Earned Rate of Return | 4.61% | (C) | |
| 11 | 4 | | Proposed Rate of Return | 7.83% | (D) | |
| 12 | 5 | | Required Operating Income | 12,521,416 | (E) | |
| 13 | 6 | | Operating Income Deficiency | 5,157,324 | (F) | |
| 14 | 7 | | Gross Revenue Conversion Factor | 135.636% | (G) | |
| 15 | 8 | | Revenue Deficiency | \$6,995,194 | | |
| 16 | | | | | | |
| 17 | 9 | | Components of Revenue Deficiency: | | | |
| 18 | 10 | | Revenues - Sales of Gas | 6,995,194 | | |
| 19 | 11 | | Other Revenues | - | | |
| 20 | 12 | | Total Revenue Deficiency | \$6,995,194 | | |
| 21 | | | | | | |
| 22 | 13 | | Forfeited Discount Ratio | 0.3840% | (H) | |
| 23 | 14 | | Forfeited Discount | \$26,863 | (I) | |
| 24 | | | | | | |
| 25 | | | <u>Revenue Conversion Factor</u> | | | |
| 26 | 15 | | Operating Revenues | 100.000% | | |
| 27 | 16 | | Add: Forfeited Discount Ratio | 0.384% | (J) | |
| 28 | 17 | | Balance | 100.384% | | |
| 29 | 18 | | Deduct: Uncollectible Ratio | 0.571% | (K) | |
| 30 | 19 | | Balance | 99.813% | | |
| 31 | 20 | | State Tax Deduction | 6.488% | | |
| 32 | 21 | | Balance | 93.325% | | |
| 33 | 22 | | Deduct: Federal Income Tax | 19.598% | | |
| 34 | 23 | | Retention Factor | 73.727% | | |
| 35 | 24 | | Revenue Conversion Factor | 135.636% | | |
| 36 | | | | | | |
| 37 | 25 | | Uncollectable Ratio | 0.569% | (L) | |
| 38 | 26 | | Uncollectible Deduction | 0.571% | (K) | |
| 39 | | | | | | |
| 40 | 27 | | State Tax Rate | 6.500% | (M) | |
| 41 | 28 | | State Tax Deduction | 6.488% | | |
| 42 | | | | | | |
| 43 | 28 | | Federal Tax Rate | 21.000% | (M) | |
| 44 | 29 | | Federal Tax Deduction | 19.598% | | |
| 45 | | | | | | |
| 46 | (A) | | RDJ-2, Schedule 1, Line 9 | | | |
| 47 | | | | | | |
| 48 | (B) | | RDJ-1, Schedule 1, Line 13, Column 1 | | | |
| 49 | | | | | | |
| 50 | (C) | | Line 2/Line 1 | | | |
| 51 | | | | | | |
| 52 | (D) | | RDJ-3, Schedule 1, Line 5, Column 3 | | | |
| 53 | | | | | | |
| 54 | (E) | | Line 4 x Line 1 | | | |
| 55 | | | | | | |
| 56 | (F) | | Line 5 - Line 2 | | | |
| 57 | | | | | | |
| 58 | (G) | | Line 24 | | | |
| 59 | | | | | | |
| 60 | (H) | | Line 16 | | | |
| 61 | | | | | | |
| 62 | (I) | | Line 12 * Line 13 | | | |
| 63 | | | | | | |
| 64 | (J) | | CGC TPUC MFG Item 69, Attachment Forfeited Disc Factor 69-14 | | | |
| 65 | | | | | | |
| 66 | (K) | | Line 25* Line 17 | | | |
| 67 | | | | | | |
| 68 | (L) | | CGC TPUC MFG Item 25, Attachment Bad Debt MFG 25-6 | | | |
| 69 | | | | | | |
| 70 | (M) | | Statutory Rates | | | |

| | A | B | C | D | E | F | G | H |
|----|---|--|---|---|----------------------|---|-----------------------|------------|
| 1 | Chattanooga Gas Company | | | | | | | |
| 2 | Tennessee Excise and Federal Income Taxes | | | | | | | |
| 3 | Twelve Months Ended June 30, 2019 (Attrition Period) | | | | | | | |
| 4 | | | | | 1 | | 2 | |
| 5 | | | | | (A) | | (A) | |
| 6 | | | | | Attrition | | Attrition | |
| 7 | | | | | Period at | | Period at | |
| 8 | Line | | | | Current Rates | | Proposed Rates | |
| 9 | No. | Description | | | | | | |
| 10 | | | | | | | | |
| 11 | 1 | Revenues - Sales of Gas | | | \$70,623,501 | | 77,618,695 | |
| 12 | 2 | Cost of Gas | | | 38,791,279 | | 38,791,279 | |
| 13 | 3 | Base Revenues | | | 31,832,222 | | 38,827,416 | |
| 14 | | | | | | | | |
| 15 | 4 | Other Revenues | | | 612,767 | | 639,630 | |
| 16 | 5 | AFUDC | | | 900,355 | | 900,355 | |
| 17 | 6 | Total Operating Revenues | | | 33,345,344 | | 40,367,401 | |
| 18 | | | | | | | | |
| 19 | 7 | Operation and Maintenance Expense | | | 13,664,603 | | 13,704,568 | |
| 20 | 8 | Depreciation Expense | | | 8,035,649 | | 8,035,649 | |
| 21 | 9 | Interest on Customer Deposits | | | 96,740 | | 96,740 | |
| 22 | 10 | Taxes Other than Federal Income | | | 3,523,947 | | 3,523,947 | |
| 23 | | | | | | | | |
| 24 | 11 | Net Operating Income Before Interest and Income Taxes | | | \$8,024,404 | | \$15,006,497 | |
| 25 | | | | | | | | |
| 26 | 12 | Interest Expense | | | 3,667,592 | | 3,667,592 | (B) |
| 27 | | | | | | | | |
| 28 | 13 | Net Income Before Income Taxes | | | \$4,356,812 | | \$11,338,904 | |
| 29 | | | | | | | | |
| 30 | 14 | Permanent Adjustments to Book Income | | | 7,574 | | 7,574 | (C) |
| 31 | | | | | | | | |
| 32 | 15 | Net Taxable Income | | | 4,364,386 | | 11,346,478 | |
| 33 | | | | | | | | |
| 34 | 16 | Excise Tax Rate | | | 6.50% | | 6.50% | (D) |
| 35 | | | | | | | | |
| 36 | 17 | Excise Tax | | | \$283,685 | | \$737,521 | |
| 37 | | | | | | | | |
| 38 | 18 | Federal Taxable Income | | | \$4,080,701 | | \$10,608,957 | |
| 39 | | | | | | | | |
| 40 | 19 | Federal Income Tax Rate | | | 21% | | 21% | (D) |
| 41 | | | | | | | | |
| 42 | 20 | Federal Income Tax Expense | | | \$856,947 | | \$2,227,881 | |
| 43 | | | | | | | | |
| 44 | 21 | Amortization of Deferred Tax Liability - Federal | | | (21,351) | | (21,351) | (E) |
| 45 | 22 | Amortization of Deferred Tax Liability - State | | | (18,081) | | (18,081) | (F) |
| 46 | 23 | Amortization of Deferred Federal Tax Liability - Tax Cuts & Jobs Act | | | (377,830) | | (377,830) | (G) |
| 47 | 24 | Amortization of Deferred State Tax Liability - Tax Cuts & Jobs Act | | | (63,058) | | (63,058) | (H) |
| 48 | | | | | | | | |
| 49 | 25 | Tennessee Excise and Federal Income Tax Expense | | | \$660,313 | | \$2,485,082 | |
| 50 | | | | | | | | |
| 51 | (A) | RDJ-1, Schedule 1, (except line 12 - see (B) below)) | | | | | | |
| 52 | (B) | RDJ-3, Schedule 1, Line 11, Column 1 | | | | | | |
| 53 | (C) | CGC TPUC MFG Item 61-2, Line 6 | | | | | | |
| 54 | (D) | Statutory Rates | | | | | | |
| 55 | (E) | CGC TPUC MFG Item 61-2, Line 28, Federal | | | | | | |
| 56 | (F) | CGC TPUC MFG Item 61-2, Line 28, State | | | | | | |
| 57 | (G) | CGC TPUC MFG Item 61-2, Line 27, Federal | | | | | | |
| 58 | (H) | CGC TPUC MFG Item 61-2, Line 27, State | | | | | | |

| | A | B | C | D | E | F |
|----|--|---|--|---------------|-------------------------|---|
| 1 | | | | | | |
| 2 | Chattanooga Gas Company | | | | | |
| 3 | Average Rate Base | | | | | |
| 4 | For the Twelve Months Ending June 30, 2019 (Attrition Period) | | | | | |
| 5 | | | | | | |
| 6 | Line | | | | | |
| 7 | No. | | | | Attrition Period | |
| 8 | 1 | | Utility Plant in Service | \$301,415,025 | (A) | |
| 9 | 2 | | Construction Work In Progress | 12,375,743 | (B) | |
| 10 | 3 | | Pension | 6,631,181 | (C) | |
| 11 | 4 | | Postretirement Benefits Other than Pens | 2,374,783 | (C) | |
| 12 | 5 | | Working Capital Requirement | 10,878,534 | (D) | |
| 13 | | | | \$333,675,265 | | |
| 14 | | | | | | |
| 15 | | | Less: | | | |
| 16 | 6 | | Accumulated Provision For Deprec | \$127,903,439 | (E) | |
| 17 | 7 | | Reg. Liability - Excess Deferrals | \$21,105,662 | (F) | |
| 18 | 8 | | Accumulated Deferred Income Tax | 24,809,455 | (G) | |
| 19 | | | Total Deductions | \$173,818,555 | | |
| 20 | | | | | | |
| 21 | 9 | | Rate Base | \$159,856,710 | | |
| 22 | | | | | | |
| 23 | | | | | | |
| 24 | (A) | | CGC TPUC MFG Item 69, Attachment Plant in Service 69-1 | | | |
| 25 | | | | | | |
| 26 | (B) | | CGC TPUC MFG Item 69, Attachment CWIP 69-2 | | | |
| 27 | | | | | | |
| 28 | (C) | | CGC TPUC MFG Item 69, Attachment Pensions&OPEB 69-12 | | | |
| 29 | | | | | | |
| 30 | (D) | | RDJ-2, Schedule 2, Line 13 | | | |
| 31 | | | | | | |
| 32 | (E) | | CGC TPUC MFG Item 69, Attachment Accum Depr 69-9 | | | |
| 33 | | | | | | |
| 34 | (F) | | CGC TPUC MFG Item 69, Attachment Tax Cuts & Jobs Act 69-13 | | | |
| 35 | | | | | | |
| 36 | (G) | | CGC TPUC MFG Item 69, Attachment ADITs 69-8, Page 1 of 4 | | | |

| | A | B | C | D | E |
|----|-------------|--|-------------------------|---------------------|------------|
| 1 | | | | | |
| 2 | | Chattanooga Gas Company | | | |
| 3 | | Working Capital Requirement | | | |
| 4 | | For the Twelve Months Ending June 30, 2019 (Attrition Period) | | | |
| 5 | | | | | |
| 6 | Line | | | | |
| 7 | No. | | Attrition Period | | |
| 8 | 1 | Requirement For Lead Lag | | \$2,184,306 | (A) |
| 9 | 2 | Materials and Supplies | | 403,477 | (B) |
| 10 | 3 | Prepayments | | 46,418 | (B) |
| 11 | 4 | Stored Gas Inventory | | 9,710,633 | (C) |
| 12 | 5 | Deferred Rate Case | | 762,623 | (D) |
| 13 | | | | | |
| 14 | 6 | Total Additions | | \$13,107,458 | |
| 15 | | | | | |
| 16 | | | | | |
| 17 | 7 | Reserve for Uncollectibles Accounts | | \$180,021 | (E) |
| 18 | 8 | Unclaimed Customer Credits & Checks | | 72,013 | (F) |
| 19 | 9 | Reserve for Health Insurance | | 31,616 | (F) |
| 20 | 10 | Customer Deposits | | 1,612,342 | (G) |
| 21 | 11 | Accrued Interest on Customer Deposits | | 332,933 | (H) |
| 22 | | | | | |
| 23 | 12 | Total Deductions | | \$2,228,924 | |
| 24 | | | | | |
| 25 | 13 | Working Capital Requirement | | <u>\$10,878,534</u> | |
| 26 | | | | | |
| 27 | | | | | |
| 28 | (A) | RDJ-2, Schedule 3, Line 25, Column 3 | | | |
| 29 | | | | | |
| 30 | (B) | CGC TPUC MFG Item 69, Attachment M&S and Prepay 69-11 | | | |
| 31 | | | | | |
| 32 | (C) | CGC TPUC MFG Item 69, Attachment Inventory 69-3 | | | |
| 33 | | | | | |
| 34 | (D) | CGC TPUC MFG Item 69, Attachment Deferred Debits 69-4 | | | |
| 35 | | | | | |
| 36 | (E) | CGC TPUC MFG Item 69, Attachment Reserves 69-5, Page 1 of 2 | | | |
| 37 | | | | | |
| 38 | (F) | CGC TPUC MFG Item 69, Attachment Reserves 69-5, Page 2 of 2 | | | |
| 39 | | | | | |
| 40 | (G) | CGC TPUC MFG Item 69, Attachment Customer Deposits 69-6 | | | |
| 41 | | | | | |
| 42 | (H) | CGC TPUC MFG Item 69, Attachment Int. on Cust. Deposits 69-7 | | | |

| | A | B | C | D | E | F | G | H | I | J |
|----|--|--|---|---|-------------------------|---|-----------------|---|------------------|------------|
| 1 | Chattanooga Gas Company | | | | | | | | | |
| 2 | Lead Lag Requirement After Revenue Adjustment | | | | | | | | | |
| 3 | For the Twelve Months Ending June 30, 2019 (Attrition Period) | | | | | | | | | |
| 4 | | | | | | | | | | |
| 5 | | | | | 1 | | 2 | | 3 | |
| 6 | | | | | Required Income | | | | | |
| 7 | | | | | Statement | | (A) | | | |
| 8 | Line | | | | Attrition Period | | Lag Days | | \$ Days | |
| 9 | No. | | | | | | | | | |
| 10 | 1 | Revenues | | | \$ 79,158,679 | | 43.76 | | 3,464,099,494 | |
| 11 | | | | | | | | | | |
| 12 | 2 | Gas Purchased | | | \$ 38,791,279 | | 40.94 | | 1,588,293,591 | |
| 13 | 3 | Salary and Wages | | | 3,594,761 | | 39.02 | | 140,259,773 | |
| 14 | 4 | Pension | | | 31,677 | | - | | - | |
| 15 | 5 | Postretirement Benefits Other than Pens | | | (114,698) | | - | | - | |
| 16 | | Miscellaneous Employee Benefits | | | 1,781 | | 4.47 | | 7,959 | |
| 17 | | 401K Benefits | | | 102,951 | | 12.07 | | 1,242,518 | |
| 18 | 6 | Health/Life Insurance Expense | | | 625,459 | | 8.98 | | 5,617,439 | |
| 19 | 7 | Allocated Cost | | | 5,371,530 | | 21.94 | | 117,824,735 | |
| 20 | 8 | Uncollectible | | | 204,108 | | 43.76 | | 8,932,049 | |
| 21 | 9 | Other Operating | | | 4,376,312 | | 31.49 | | 137,791,970 | |
| 22 | 10 | Depreciation and Amortization | | | 7,718,130 | | - | | - | |
| 23 | 11 | Taxes - Other Than Income Tax | | | 3,366,535 | | 118.49 | | 398,891,138 | |
| 24 | 12 | SIT Current | | | 451,716 | | 37.88 | | 17,108,741 | |
| 25 | 13 | SIT Deferred | | | 204,666 | | - | | - | |
| 26 | 14 | FIT Current | | | 1,991,439 | | 37.88 | | 75,425,756 | |
| 27 | 15 | FIT Deferred | | | (162,739) | | - | | - | |
| 28 | 16 | Interest on Customer Deposits | | | 96,740 | | - | | - | |
| 29 | 17 | Interest ST Debt | | | 303,408 | | (51.36) | | (15,583,187) | |
| 30 | 18 | Interest LT Debt | | | 3,364,184 | | 45.76 | | 153,932,105 | |
| 31 | 19 | Equity Return | | | 8,839,440 | | - | | - | |
| 32 | | | | | | | | | | |
| 33 | 20 | Total Operating Funds | | | \$ 79,158,679 | | 33.22 | | \$ 2,629,744,585 | |
| 34 | | | | | | | | | | |
| 35 | 21 | Net Lead (Lag) Days | | | | | 10.54 | | | |
| 36 | | | | | | | | | | |
| 37 | 22 | Average Daily Operating Expenses | | | | | | | \$ 216,873 | |
| 38 | | | | | | | | | | |
| 39 | 23 | CWC Required for Operating Expenses | | | | | | | 2,285,904 | |
| 40 | | | | | | | | | | |
| 41 | 24 | Tax Collections Withheld | | | | | | | (101,598) | (B) |
| 42 | | | | | | | | | | |
| 43 | 25 | Net Cash Working Capital Provided | | | | | | | \$ 2,184,306 | |
| 44 | | | | | | | | | | |
| 45 | | | | | | | | | | |
| 46 | (A) | MJA-1, Schedule 1, Column B | | | | | | | | |
| 47 | | | | | | | | | | |
| 48 | (B) | CGC TPUC MFG Item 25, Attachment Sales Tax Coll MFG 25-7 | | | | | | | | |

| | A | B | C | D | E | F | G | H | I | J |
|----|--|--|---|--------------|----------|------------------|----------|---------------------|-----------------|---|
| 1 | Chattanooga Gas Company | | | | | | | | | |
| 2 | Summary of Estimated Consolidated Cost of Capital | | | | | | | | | |
| 3 | For the Twelve Months Ending June 30, 2019 (Attrition Period) | | | | | | | | | |
| 4 | | | | | | | | | | |
| 5 | | | | | | | | | | |
| 6 | | | | | 1 | | 2 | | 3 | |
| 7 | Line | | | | | | | | Weighted | |
| 8 | No. | Capital Structure Component | | Ratio | | Cost Rate | | Average Cost | | |
| 9 | | | | | | | | | | |
| 10 | 1 | Short-term debt | | 6.30% | | 3.01% | | 0.19% | (A) | |
| 11 | | | | | | | | | | |
| 12 | 2 | Long-Term Debt | | 44.47% | | 4.73% | | 2.10% | (A) | |
| 13 | | | | | | | | | | |
| 14 | 3 | Total Debt | | 50.77% | | | | 2.29% | | |
| 15 | | | | | | | | | | |
| 16 | 4 | Common Equity | | 49.23% | | 11.25% | | 5.54% | (A) | |
| 17 | | | | | | | | | | |
| 18 | 5 | Total Capitalization | | 100.00% | | | | 7.83% | | |
| 19 | | | | | | | | | | |
| 20 | | | | | | | | | | |
| 21 | | | | | | | | | | |
| 22 | | Retail Interest Expense Calculation | | | | | | | | |
| 23 | 6 | Estimated Rate Base | | 159,856,710 | | | | | | |
| 24 | | | | | | | | | | |
| 25 | 7 | Weighted Average Short Term Rate | | 0.19% | | | | | | |
| 26 | | | | | | | | | | |
| 27 | 8 | Short Term Interest | | 303,408 | | | | | | |
| 28 | | | | | | | | | | |
| 29 | 9 | Weighted Average Long Term Rate | | 2.10% | | | | | | |
| 30 | | | | | | | | | | |
| 31 | 10 | Long term Interest | | 3,364,184 | | | | | | |
| 32 | | | | | | | | | | |
| 33 | 11 | Total Interest | | 3,667,592 | | | | | | |
| 34 | | | | | | | | | | |
| 35 | | | | | | | | | | |
| 36 | (A) | CGC TPUC MFG Item 81-1 | | | | | | | | |