

STATE OF TENNESSEE

Office of the Attorney General



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March 14, 2018

David Jones, Chairman
c/o Sharla Dillon
Docket Manager
Tennessee Public Utility Commission
502 Deaderick Street
Nashville, TN 37243

Re: TPUC Docket 18-00017 – Procedural Schedule Proposed by the Consumer Advocate

Dear Chairman Jones:

With reference to the Hearing Officer's instructions in the above-referenced Docket, attached are the Consumer Advocate's proposals under the scenario envisioning an August 21 hearing on the merits and a September 17 hearing on the merits.

Mr. Walker, on behalf of the Chattanooga Regional Manufacturers Association, has stated his concurrence with the Consumer Advocate's proposals.

With respect to the two proposed schedules, there appear to be two dates and two paragraphs on which the Parties do not agree. First, on the schedule that would result in a hearing on August 21, the Consumer Advocate believes that a July 10 due date for Intervenor Pre-filed Testimony would allow the Consumer Advocate to perform more analysis and provide more complete testimony than if its analysis and testimony were cut off on the date requested by CGC. In a Docket like the current one, in which CGC has not had a rate case in a number of years and there are complex issues involved, the Consumer Advocate respectfully points out that it will need all the time it receives (and could use more).

Second, on the schedule that would result in a hearing on September 17, the Consumer Advocate believes that requiring CGC to provide responses to the Consumer Advocate's First Formal Round of Discovery on April 10 would allow CGC, in view of CGC's already extensive

David Jones, Chairman
Tennessee Public Utility Commission
March 14, 2018
Page 2

knowledge of its rate case and the number of personnel and resources that it has at its disposal to respond to questions, adequate time to respond. From the Consumer Advocate's perspective, there is no reason to cut into the already limited amount of total analysis and testimony preparation time that the Consumer Advocate has in this Docket.

In addition, the Consumer Advocate recommends that the first narrative paragraph, dealing with informal discovery and related deadlines, be retained as presented to further the goals of administrative efficiency and economy, as well as to provide a mechanism by which TPUC Staff and the public are concurrently provided information developed in this Docket.

Finally, the Consumer Advocate recommends the fourth narrative paragraph be retained to permit clarity as to the issues being rebutted.

If you have question, please contact me at (615) 532-5512.

Sincerely,



Wayne M. Irvin (BPR No. 30946)
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Consumer Advocate and Protection Division
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cc: Certificate of Service

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:

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This the 14th day of March, 2018.



Wayne M. Irvin

TPUC DOCKET NO. 18-00017
PROPOSED PROCEDURAL SCHEDULES

Target Hearing Date 8/21/2018	Target Hearing Date 9/17/2018	
2/15/2018	2/15/2018	Chattanooga Gas Company (CGC) filed Petition
3/12/2018	3/12/2018	Status Conference
3/20/2018	3/20/2018	First Formal Round Intervenor Discovery Requests Due
4/10/2018	4/10/2018	First Formal Round Responses to Intervenor Discovery Due
4/24/2018	5/11/2018	Second Formal Round of Intervenor Discovery Requests Due
5/8/2018	6/1/2018	Second Formal Round Responses to Intervenor Discovery Due
7/10/2018	7/13/2018	Intervenor Pre-filed Direct Testimony Due
7/16/2018	7/30/2018	CGC Discovery Requests Due
7/20/2018	8/10/2018	Intervenor Discovery Responses Due
7/25/2018	8/13/2018	Final Discovery Request Date
8/3/17	8/29/2018	CGC Pre-Filed Rebuttal Testimony Due
TBD	TBD	TPUC Public Comment Hearing in Chattanooga
8/14/2018	9/5/2018	Pre-Hearing Conference for General Rate Case
8/21/18	9/17/2018	Target Date for Hearing on the Merits for General Rate Case

9/4/2018	10/2/2018	If Needed, Post-Hearing Briefs Due
9/17/2018	10/15/2018	Target Date for TPUC Deliberations on General Rate Case
10/1/2018	11/1/2018	Target Date for Effective Date of New Rates

In addition to the formal discovery dates set forth herein, the Parties request that each be permitted to make informal discovery requests at any time up to the Final Discovery Request Date and that each party be ordered to respond fully and completely to each such discovery request within 10 business days of the issuance of such discovery request. Further, the responding Party also should be ordered to simultaneously file such responses with the Commission on the day that discovery responses are provided to the requesting Party.

All spreadsheets filed in discovery responses shall be in Excel format with working formulas intact.

Any pre-filed testimony shall include all supporting worksheets in Excel format with working formulas intact. To the extent that any pre-filed testimony or other filing prior to the date of the Order implementing this Procedural Schedule has been made without supporting worksheets in Excel format with working formulas intact, the filing Party shall comply with this requirement within 3 days of the Order implementing Procedural Schedule.

Rebuttal Testimony should be limited only to issues raised in Intervenor's Direct Testimony and should include the page and line number of the Intervenor's testimony that is being rebutted.