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BEFORE THE TENNESSEE PUBLIC UTILITY COMMISSION
NASHVILLE, TENNESSEE

May 29, 2020

IN RE:	)	
	)	
EMERGENCY PETITION OF THE	)	**Docket No.**
CONSUMER ADVOCATE UNIT OF	)	
THE FINANCIAL DIVISION OF	)	**20-00047**
THE OFFICE OF THE TENNESSEE	)	
ATTORNEY GENERAL	)	

CHATTANOOGA GAS COMPANY'S FURTHER REPORT IN RESPONSE TO THE COMMISSION'S MARCH 31, 2020 ORDER

Chattanooga Gas Company ("CGC" or "Company"), in response to the Tennessee Public Utility Commission ("Commission") Order of March 31, 2020 ("Order"), in the above captioned docket, and CGC's 30-day report filed on April 30, 2020, hereby provides the following further response to the Commission regarding the Company's response to the COVID-19 pandemic:

1. As a prefatory matter, since the beginning of this national health emergency CGC's interest has been to ensure that the Company continues to provide safe and reliable natural gas service while not adversely impacting the health of its customers and employees. Prior to the Commission's Order, CGC had already ceased to disconnect customers for the nonpayment of service in order to not further any hardships customers may have been experiencing. In addition, the Company has been reporting weekly to the Commission since early March regarding the various actions it has taken to protect customers and employees while continuing to safely and reliably deliver natural gas to our customers.

2. In the Order, the Commission directed that in 30 days, or by April 30, each utility should update the Commission's on its response to the COVID-19 pandemic, including specifically a description of "any temporary grace period, payment plan, and other options that will be implemented or will continue following the expiration or lifting of the public health emergency declaration." Order, at page 12. Just prior to the submission of the Company's 30-day report, the Governor issued Executive Order No. 30 that extended the state of emergency declaration through May 29, 2020. Based on the extension of the state of emergency, CGC felt it was premature to speak more definitively regarding the actions it may take once the state of emergency was over. Given the ongoing pandemic, CGC advised the Commission that it would provide additional information by May 29, coincident with the termination of the Executive Order No. 30 state of emergency declaration.

3. On May 6, 2020, Governor Lee issued Executive Order No. 34 which, among other things, further extends the state of emergency declaration through at least June 30, 2020, absent earlier action. One effect of Executive Order 34 is to thereby further extend the effectiveness of the Commission's Order also through June 30. Accordingly, CGC advises the Commission that it shall continue to not disconnect customers for nonpayment of services at least through June 30, 2020, unless further extended.

4. CGC appreciates that its customers who have been adversely impacted by this health emergency and who have been unable to pay their natural gas bills probably have more important issues to deal with than when or how they may pay their natural gas bills. Given the present disruption and uncertainty, CGC believes that this is an appropriate time to provide customers with guidance on how CGC would like to help transition customers back to getting their bills caught up and paid once the state of emergency is over. In moving forward with such a

customer repayment plan, CGC appreciates that the transition to the new normal will not be immediate or at the same pace for all customers.

5. After assessing the flexibility and limits of CGC's various customer billing and support systems, once the state of emergency has ended CGC will undertake the following actions for the benefit of helping our customers transition to getting paid up for bills they may have missed during this emergency situation.

a. Service Disconnections for Nonpayment. As previously indicated, CGC will continue to not terminate customers for the nonpayment of services at least through June 30, 2020. However, CGC shall further commit to not terminating customers for the nonpayment of services for 30 additional days following the termination of the state of emergency declaration. Based upon the present June 30, 2020, date, this would be through July 30, 2020. If the Governor lengthens the state of emergency beyond June 30, 2020, CGC's no disconnect policy shall be extended 30 additional days beyond any such ending date for the state of emergency set by the Governor.

b. Alternative Payment Program. For customers who are not current in paying their bills as of the last day stated in the Governor's emergency declaration, those customers may elect to participate in the Company's Alternative Payment Program ("APP"). This program may be accessed through a Company website or a call to the customer services center. Information for both of these access points will be distributed in the company's billing statements, posted on the Company's website, and communicated through the local news media and social media channels. Generally, residential and commercial customers will be asked to make some form of a down-payment and also elect a repayment schedule for past due amounts that will be based on financial ability and the period of time of nonpayment. So long as customers participate in the APP and timely make the appropriate payments, their service shall not be terminated or noticed for termination.

c. Late Fees. For customers choosing to timely participate in the APP program, the Company shall voluntarily waive its late payment fees during the state of the emergency declaration plus the period of time the customer has chosen to get caught up in payments.

d. Non-Participation Disconnection. For those customers who fail to make an election and agree to participate in the Company's APP, or who elect to participate in the APP but fail to stay current, then such customers shall be subject to termination for the nonpayment of services upon timely notice pursuant to Commission Rule 1220-04-03-.19. Customers may opt out of the notice of termination by either paying their bills in full or enrolling in the APP not to exceed the months remaining in the program at that point in time. Customers who were in the APP program but failed to stay current may avoid termination by getting caught up to the previously committed APP payment status.

6. CGC believes that this Alternative Payment Program provides a reasonable mechanism for customers who may be experiencing hardship from the coronavirus pandemic to return to a current payment status by giving them a flexible period or time to become current based upon their individual circumstances. Further, by waiving the Company's late payment fees, this will provide an additional economic benefit to customers who may have suffered from this pandemic.

7. CGC will advise the Commission regarding the implementation of its Alternative Payment Program as a part of its weekly COVID-19 reporting so long as those weekly reports are

required. Thereafter, CGC will provide a monthly report to the Commission by the 15^{th} day of each month regarding both how it is continuing to deal with the coronavirus pandemic and relevant information regarding the Alternative Payment Program, unless circumstances merit more frequent reporting. This monthly reporting would continue through the effectiveness of the APP following the end of the state of emergency declaration, unless it is necessary to continue it for a longer period of time.

8. Further, to the extent necessary, CGC requests that the Commission grant to CGC any necessary rule or tariff waivers in order to implement the Alternative Payment Program as set forth herein.

9. CGC shall continue to work to protect its customers and employees from the COVID-19 coronavirus while working every day to ensure the safety and security of its natural gas system. If circumstances materially change, CGC reserves the right to address with the Commission any necessary or appropriate modifications to its Alternative Payment Plan or to propose alternative or substitute actions and policies if in the public interest.

Respectively Submitted,

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