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Tennessee Public Utility Commission
502 Deaderick Street, 4th Floor
Nashville, TN 37243

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Chairman Robin L. Morrison,

I am again responding to the Commission's request to provide a weekly update regarding Chattanooga Gas's (CGC) response to the novel coronavirus (COVID-19). This updated letter is intended to give TPUC a general overview of our plans to support necessary public safety actions while meeting our ongoing obligation to serve our customers and communities. We are following relevant health and safety guidelines and will continue to adapt to changes to those guidelines as the situation progresses.

Changes to our processes from last week's letter (dated 6/23/20) have been noted for distinction.

Operational and Business Changes: Chattanooga Gas has implemented new work procedures to address social distancing recommendations from the Centers for Disease Control and Prevention (CDC). We have adjusted our operations to manage a staff that is operating remotely in a manner that maintains our normal service standards and compliance obligations. Many of our employees – primarily corporate and office support staff – are working exclusively from home. Our field employees and contractors are working on a modified basis while continuing to deliver our core utility functions. We have equipped our field employees with personal protective equipment for appropriate occasions for their safety and to protect the community. We have provided training on personal hygiene and public health best practices; and we created a COVID-19 hotline for employees to speak with medical professionals who can answer their questions about the virus. In view of Governor Lee's Executive Order No. 30 extending certain aspects of the TN State of Emergency as well as gradually reopening the state's business and commerce, CGC has reviewed our processes to ensure compliance with all relevant orders. We continue to be prepared, through our business continuity planning, to prioritize essential and emergency services as COVID-19 impacts our workforce and the communities we serve. We've already taken great measures to protect the safety of our employees. This began with only performing essential work-orders like service activations, emergency leak response, and all tasks that are necessary for us to maintain regulatory compliance. We have also suspended or delayed non-essential work including service disconnections, meter changes and below-ground maintenance that would cause service interruption, non-urgent compliance work, and periodic testing.

In recognition that community health conditions will eventually improve, and in fact business restrictions are already being eased by state and local governing authorities, CGC has begun planning for a responsible phased reentry to more normal business operations. As improvements in COVID-19 community health indicators are documented by health officials, CGC will begin reinstating certain previously restricted work types and working locations. The prioritization of non-essential or non-urgent work will continually be reassessed and revised to ensure public safety and appropriate responses to current community health conditions.

As of the week of 5/18/20, CGC has restarted working of Grade III leak repairs that may cause field personnel to enter a premise to relight appliances. Personnel will continue to follow all previous COVID-19 protocols for health and safety.

Customer Service, Billing and Communications: In recognition that the evolving landscape surrounding COVID-19 may cause financial hardship for customers impacted by employment changes or business slowdown, Chattanooga Gas has made temporary changes to our shut-offs for nonpayment (SONP) procedures. Revised to be effective March 12 per TPUC's 3/31/20 order, Chattanooga Gas suspended service disconnections for nonpayment for both residential and commercial customers. ***In response to TPUC's 6/29/20 decision, CGC will continue to suspend SONPs through at least 8/10/20.*** Additional customer assistance measures, including continued SONP suspension, which are outlined in our 60-Day Update Report filed on 5/29/20 are intended to be flexible and innovative approaches to keeping customers' natural gas service connected while providing additional time and means of paying past due balances. ***CGC will further detail the specifics of the assistance measures and how unpaid customer bills should be treated in a proposal to be filed with the Commission by 7/15/20.*** Customers are being informed through our website, email, press releases, and other outlets that energy assistance options are available to support those impacted by the COVID-19 emergency. Additionally, our call center is supporting customers and field employees by implementing a screening procedure to help identify customers' health status before assigning work and encouraging customers to reschedule nonessential work. We are utilizing Keep Me Informed (KMI) to check in with customers ahead of service calls to make sure we are prepared to help them as best we can, regardless of their health status.

Communications with State and Local Agencies: CGC has sent communications to state and local government and county emergency management agencies reminding them of our duty to serve and the modifications we are making to ensure public health. CGC is also providing periodic updates to local chambers of commerce on our activities and coordinating with other utilities and industry associations in the state to ensure greater consistency in our ongoing response. We also have previously provided TPUC several written reports and updates of our responses to the crisis. Per TPUC's 3/31/20 order, CGC submitted a 30-day Update Report to the Commission on 4/30/20 in which CGC stated that our SONP Suspension would continue through at least 5/29/20. Subsequently, Executive Order 34 issued on 5/6/20, extended the State of Emergency through June 30. CGC submitted a follow-up 60-Day Update Report on 5/29/20 which addresses the continuation of the SONP Suspension and how we have committed to assist customers to catch-up on their past due bill once the TN State of Emergency has ended. As the Commission knows, also on 5/29/20, CGC filed its 2019 Annual Review Mechanism filing that includes a primary proposal to accelerate the amortization of certain tax credits and other benefits associated with the Tax Cut and Jobs Act of 2017. CGC appreciates the Commission granting its request to delay this agreed upon and required filing from April 20, 2020 until May 29, 2020.

Compliance and Ability to Serve: We do not anticipate any disruption to the delivery of our utility services. Chattanooga Gas will continue to monitor public health directives and modify our business methodologies accordingly in order to ensure the well-being of our customers and employees, as well as the continuity of our services. As circumstances change, if any required future modifications may impact compliance deadlines or significant workforce staffing requirements, Chattanooga Gas will inform the Tennessee Public Utility Commission immediately.

Chattanooga Gas welcomes the opportunity to work with you and your staff so that citizens and customers are protected and can continue to receive safe and reliable natural gas service. Thank you for your ongoing efforts.

Sincerely,

A handwritten signature in black ink, appearing to read "Paul Teague". The signature is fluid and cursive, with the first name "Paul" being more prominent than the last name "Teague".

Paul Teague
Director, External Affairs
Chattanooga Gas Company