IN THE TENNESSEE PUBLIC UTILITY COMMISSION AT NASHVILLE, TENNESSEE

IN RE:)	
)	
CHATTANOOGA GAS COMPANY)	
PETITION TO OPT INTO AN)	DOCKET NO. 20-00049
ANNUAL REVIEW OF RATES)	
MECHANISM PURSUANT TO)	
TENN. CODE ANN. § 65-5-103(d)(6))	

CHATTANOOGA GAS COMPANY'S SECOND RESPONSES AND OBJECTIONS TO THE CONSUMER ADVOCATE'S SECOND SET OF DISCOVERY AND THE CONSUMER ADVOCATE'S INFORMAL DISCOVERY REQUEST OF JULY 14, 2020

Pursuant to the July 6, 2020, Order Establishing Procedural Schedule, Chattanooga Gas Company ("CGC" or "Company") hereby submits its second responses and objections to the Second Set of Discovery of the Consumer Advocate Unit in the Financial Division of the Tennessee Attorney General's Office ("Consumer Advocate") as well as to the Consumer Advocate's Informal Discovery Request of July 14, 2020. Pursuant to the Rules of the Tennessee Public Utility Commission and the Tennessee Rules of Civil Procedure, CGC's discovery responses are attached hereto.

GENERAL OBJECTIONS

CGC hereby adopts its general objections to the Consumer Advocate's First Discovery Requests previously filed on June 12, 2020, Chattanooga Gas Company's Further Responses and Objections to the First Discovery Request of the Consumer Advocate filed on June 26, 2020, and Chattanooga Gas Company's First Responses And Objections To The Second Discovery Request of The Consumer Advocate filed on July 15, 2020. Subject to, and without waiving any general objection made therein, CGC's second responses to the Second Informal Discovery Requests appears hereafter on the subsequent pages and attachments being provided.

Respectfully Submitted,

J. W. Luna, Esq. (BPR No. 5780) Butler Snow, LLP

The Pinnacle at Symphony Place 150 3rd Avenue S, Suite 1600 Nashville, TN 37201

and

Floyd R. Self, Esq. Berger Singerman, LLP 313 North Monroe Street, Suite 301 Tallahassee, FL 32301

Counsel for Chattanooga Gas Company

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and exact copy of the foregoing document has been served by electronic mail, postage pre-paid U.S. first-class mail, and/or delivering a copy by hand, upon the following person(s) on this the 17th day July, 2020:

Counsel for the Consumer Advocate
Daniel P. Whitaker, III, Esq.
Karen H. Stachowski, Esq.
Office of the Tennessee Attorney General
Financial Division, Consumer Advocate Group
P.O. Box 20207
Nashville, Tennessee 37202

Consumer Advocate Unit Data Request Set: CA-2

CA 2-8

QUESTION:

Regarding the response and attachment to CA No. 1-32 and referencing Schedule 19.1, provide the following information:

- a. CGC incurred charges of \$159,712 to Maycreate LLC in 2019. Provide copies of each public messaging piece created by Maycreate LLC along with the associated cost of each piece inclusive of the advertisement medium costs. If Maycreate LLC did not create the actual customer messaging pieces, identify the vendor(s) who created the graphics/messaging, and provide such documents along with their associated costs;
- CGC incurred costs of \$83,750 from the vendor Urbint associated with the provision of Damage Prevention predictive Analytics. Provide a description of damage prevention analytics, including an explanation of how the adoption of such analytics will reduce damages;
- c. CGC incurred costs associated with Pivitol Home Solutions (PHS). Describe the conditions under which calls are transferred or switched to PHS: and
- d. Describe the compensation flowing from CGC to PHC for taking calls and provide a thorough discussion of how such compensation is determined.

RESPONSE:

a. Please see CA 2-8a Attachment A for copies of each public messaging piece created by Maycreate LLC along with the associated cost of each piece inclusive of the advertisement medium costs. Chattanooga Gas had a contract with Maycreate for a Safe Digging marketing Campaign for April 2019 through March 2020. In the contract, the Company agreed to pay equal installments of \$19,964 per month for 12 months. For 2019, CGC recorded and paid \$159,712 to Maycreate. Services rendered to CGC for 2019 total \$134,502 as shown in Attachment A.

Please see CA 2-8a Attachments B though CA 2-8a Attachment G for copies of the campaign messaging.

- b. Urbint conducts predictive risk modeling on facility locate tickets to assess the likelihood of a damage occurring, along with determining the consequence of an event to gas assets, facilities nearby, cost, etc. Overall this program is used to prioritize Watch & Protect intervention to mitigate risk.
 - The Company provides damage and ticket data, facility location, and attribution data to Urbint for analysis. Urbint then builds a machine learning regression model, based on reviewing patterns of historical damages, the associated ticket information, and other available data. They apply this logic to prioritize or "risk rank" pending locate tickets, with the goal of reducing the overall ticket population to a smaller subset that can be intervened on. The end product is risk ranked Intervention Locations. The Company uses Urbint's analysis to visit the dig sites, check accuracy of locate markings, check for best excavation practices, determination of safe digging, and potentially the shutdown of the excavation site if unsafe practices or locate issues are present, and thereby, preventing possible damage that may have occurred had the risk not been discovered.
- c. Calls are routed to Pivotal Home Solutions (PHS) utilizing the Company's interactive voice response call routing system based on customer selection options for residential and commercial customers requesting start or transfer of service.
- d. Please see Confidential response CA 2-3 for the Call Handling Agreement between CGC and Pivotal Home Solutions (PHS), the agreement contains an explanation and the calculation of the call handling fees paid by CGC to PHS. The call handling fees paid to PHS are recorded on the books and records of CGC in account 670200. Royalties are recorded to account 412250 and billing fees are recorded to account 670352. For 2019, PHS royalties, billing fees and call handling fees totaled \$21,035, \$9,828 and \$23,273, respectively. For 2019, the net benefit to CGC customers as a result of the transactions with PHS totals \$7,591.

Witness: Gary Tucker

Manager, Regulatory Reporting

Consumer Advocate Unit Data Request Set: CA-2

CA 2-9

QUESTION:

Identify the SGC or AGSC group which provides strategic analysis and evaluation of potential acquisition opportunities for SGC or any other CGC affiliate. Identify such costs in total and provide an explanation, inclusive of amounts, of how such amounts are allocated to CGC.

RESPONSE:

Strategic analysis and evaluation of potential acquisition opportunities performed by SCG and/or AGSC can be performed by multiple groups within the organization depending on the potential opportunity. Generally, work performed in association with strategic analysis and evaluation of potential acquisition opportunities, internal or external, is charged to the SCG holding company (GL1), and not allocated to affiliates. From time to time internal time may be spent on these analyses and allocated to affiliates. However, this time is limited and de minimis.

Witness: Gary Tucker

Manager, Regulatory Reporting

Consumer Advocate Unit Data Request Set: CA-2

CA 2-14

QUESTION:

Regarding Account 671419 Allocated Executive - Corp., provide a comprehensive explanation of this account and describe in detail why it increased by 79% between 2018 and 2019.

RESPONSE:

The primary reasons for the approximate \$43,000 increase in Account 671419 between 2018 and 2019 are as follows:

- Contribution to Electric Power Research Institute (EPRI), which has partnered with the Gas Technology Institute (GTI) to form the Low-Carbon Resources Initiative (LCRI). The effort seeks to raise funds in a collaborative effort between electric and gas companies to develop technologies that will help achieve deep decarbonization of both industries. The Low-Carbon Resources Initiative is a five-year, focused R&D commitment to provide a pathway to advance low-carbon technologies for large-scale deployment approaching 2030. The impact of this to CGC was approximately \$20,000
- Increase in LTI expense, all of which is excluded from CGC's revenue requirement through the ratemaking adjustments detailed in Schedule 27.

Witness: Gary Tucker

Manager, Regulatory Reporting

Consumer Advocate Unit Data Request Set: CA-2

CA 2-15

QUESTION:

Refer to the Company's Response to CA No. 1-71, specifically Account 670594 - Other Sales and Bonuses:

- a. Provide the job titles and amount of related incentive compensation for each employee who comprises the 2019 charges to this account;
- b. Provide the job descriptions for each employee receiving such awards comprising the 2019 expenses within this account;
- c. For each employee earning such incentive compensation in 2019, provide the underlying calculation supporting the costs resulting in the 2019 balance; and
- d. Provide the rationale for inclusion of these costs in the CGC revenue requirement.

RESPONSE:

a and b. CGC objects to this request in that this request inaccurately classifies spot and retention bonuses as "incentive compensation" since spot and retention bonuses are not incentive compensation and are not a part of the incentive compensation that has been disallowed for recovery pursuant to the terms of the CGC rate case docket Amended Final Order. This request is overly broad, unduly burdensome, expensive. oppressive, and excessively time consuming in that this request is seeking to obtain the job titles, job descriptions, and amounts of compensation by employee which would require a review of every individual employee personnel record of the services company to determine which employees received these spot and retention bonuses so that the correct job titles, job descriptions, and amounts are captured. Considering that the allocation to CGC is estimated to be less than 3% of 1,770,662, or less than \$55,000 in allocated costs, the amount of work being requested regarding this expense far exceeds the value to the case. The sole issue is whether this type of expense is recoverable, as it has been in the past, and not the individuals who received such compensation. Moreover, this request is seeking individual employee information that is confidential, irrelevant, and not likely to lead to the discovery of admissible evidence in that identifying employees by job title would have the effect of identifying some individuals by name and compensation since there are job titles that have only one employee, and such an employee-level review of these expenses is inappropriate and not the type of

information this is relevant or produced in rate setting cases like this. Notwithstanding the foregoing and without waiving its objections, CGC states:

Charges to Account 670594 are not related to incentive compensation as discussed at length in the 2018 rate case relating to the Company's short-term and long-term incentive compensation plans referred to as PPP and LTI, respectively. Incentive compensation as discussed in the rate case is both at risk compensation, meaning it defined for each and every employee with clear pre-determined targets/goals, and that compensation for those programs are driven, in part, by corporate and business unit financial performance metrics. Charges to Account 670594 are neither at risk nor driven by corporate and business unit financial performance metrics and should not be conflated as such. For this reason, while certain forms of incentive compensation were disallowed in the 2018 rate case, spot and retention bonuses were permitted as recoverable expenses and CGC is merely seeking the same treatment here as was allowed in the 2018 rate case and prior rate cases.

As noted in the Company's response to CA 1-71, the charges in Account 670594 are primarily for one-time "spot" bonuses and retention agreements. Spot bonuses are provided based on management's determination of exceptional performance by an employee and may be awarded to any employee at GAS such as those at AGSC or CGC. Retention bonuses are awarded to retain employees with specific skill sets that cannot otherwise be easily or affordably replaced.

c. CGC objects to this request in that this request inaccurately classifies spot and retention bonuses as "incentive compensation" since spot and retention bonuses are not incentive compensation and are not a part of the incentive compensation that has been disallowed for recovery pursuant to the terms of the CGC rate case docket Amended Final Order. Notwithstanding the foregoing and without waiving its objections, CGC states:

Spot bonus amounts are determined by management as rewards for exceptional or outstanding performance; retention agreement payments are made based on the individual retention agreements based upon negotiated contracts.

In general, the Company does not use retention agreements. GAS has a detailed and robust succession and workforce planning process to ensure that areas where there may be knowledge or resource gaps due to the changing dynamics in the workforce (turnover or retirements) are considered and addressed. In the specific circumstances where a retention agreement is used, it is typically because the Company has an immediate need for certain knowledge and/or skillset which the Company believes would take considerable time and effort to identify a qualified candidate with the necessary knowledge and/or skills through the normal hiring processes.

Spot bonuses are used to recognize exceptional performance by an individual or in some cases by a group of employees in a department or project team. Justification for each award must be provided and evaluated based on individual performance and

business impact such as increases in efficiency, accuracy, safety, cost savings, etc. Each award must be reviewed by the VP of Human Resources and approved by the respective Management Council member or Business unit vice president depending on dollar amount of award. An example of a spot bonus could be for someone who is assigned and completes a large project that is above and beyond their normal daily job responsibilities. Another example could be someone who brings a new business process or reinvents a business process that creates efficiencies or cost savings.

d. CGC objects to this request to the extent it is inaccurately classifying spot and retention bonuses as "incentive compensation" since spot and retention bonuses are not incentive compensation and are not a part of the incentive compensation that has been disallowed for recovery pursuant to the terms of the 2018 CGC rate case docket Amended Final Order. Notwithstanding the foregoing and without waiving its objections, CGC states:

Please see the Company's response to CA 1-71 in which it is noted that these costs are separate from and <u>not</u> part of the disallowed portions of the Company's short-term or long-term incentive plans. The costs being recovered here are the same as what was allowed in the 2018 rate case. Furthermore, the 2018 rate case included approval of approximately \$55,000 that is included in rates, and the estimated amounts being allocated for 2019 are consistent with 2018 if not lower. As discussed previously, these costs are incurred for exceptional performance of an employee and generally benefit the customers of GAS, and, accordingly, have not been adjusted out of CGC's cost of service.

Witness: Gary Tucker

Manager, Regulatory Reporting

Southern Company Gas

Objections by Counsel.

Consumer Advocate Unit Data Request Set: CA-2

CA 2-16

QUESTION:

Regarding Account 671004, Allocated Ext Relations-Dis Ops, provide a comprehensive explanation for this account along with the 1,211% increase from 2018 to 2019 (Year ending amounts of\$24,049 and \$315,366 respectively).

RESPONSE:

The reason for the substantial increase in Account 671004 between 2018 and 2019 is the dedication of a full-time resource for regulatory and external affairs purposes at AGSC. This same function was previously performed by an employee of CGC, and there were previously no allocated costs associated with this resource or function. Therefore, the direct charged payroll, benefits and overheads associated with this resource does not constitute an overall increase in costs. Additionally, there were relocation charges included in this account for the relocation of the resource to Chattanooga.

Please note that these costs are excluded 100% from CGC's revenue requirement through a ratemaking adjustment detailed in Schedules 24.1 and 24.2, specifically the adjustment associated with costs incurred in AGSC department 1637.

Witness: Gary Tucker

Manager, Regulatory Reporting

Consumer Advocate Unit Data Request Set: CA-2

CA 2-23

QUESTION: CGC contracts with two law firms to perform regulatory legal work. For legal services provided by both firms associated with all CGC dockets open during 2019, provide a comprehensive explanation of the service performed by each associated with the docket, making clear the distinction between the services provide by each firm.

RESPONSE:

CGC objects to this request as overly broad and unduly burdensome, seeking attorney-client privileged communications and attorney work product privileged information and not reasonably calculated to lead to the discovery of admissible evidence. CGC also objects to this request because the premise stated, that "CGC contracts with two law firms to perform regulatory legal work" is incorrect, as the information CGC has provided in this docket reflects more than two law firms performing regulatory legal work on behalf of CGC, in that Troutman Saunders, for example, provides legal regulatory work on behalf of CGC before the Federal Energy Regulatory Commission. Finally, CGC objects to this request to the extent it seeks "a comprehensive explanation of the services performed by each associated with the docket, making clear the distinction between the services provided by each" as answering such a question would reveal CGC's legal strategy regarding how it present its matters before the Commission. Notwithstanding the foregoing objection, which is not waived, CGC states:

Any discussion or explanation as to the services provided by CGC's attorneys would by necessity require the disclosure of legal strategy, work product, and attorney-client privileged communications, which CGC is not required to provide. However, CGC can identify the specific TPUC dockets for which CGC's principle outside TPUC attorneys provided advice and counsel during 2019. These dockets are not always specifically referenced or otherwise identified in the invoices provided by outside counsel, but the Company employees working on these matters are familiar with the work of CGC's attorneys on these matters, and in the context of dates, emails, and other ongoing work, CGC understands the context for such billings.

As CGC has verbally reported to counsel for the Consumer Advocate, each law firm has a general matter billing file in which all billable activities for CGC are recorded unless the Company has requested a specific, separate matter billing file. For both Mr. Luna's firms and Mr. Self's firm, in 2019 these lawyers' respective law firms each had a separate matter number for the recovery of legal fees and expenses associated with the 2019 ARM proceeding, Docket No. 19-00047, which is separately identified in CGC's

response to CA 1-57 CONFIDENTIAL ATTACHMENT A in the "2019 ARM Legal" tab. CGC's response to CA 1-57 CONFIDENTIAL ATTACHMENT A in the "CGC Legal Tracker Report" includes all the general matter number expenses for these firms and the other outside firms that performed work for CGC in 2019, specifically Troutman Sanders and Patrick Law Group.

With respect to the work billed to the separate billing matter for the 2019 ARM proceeding in Docket No. 19-00047, Petition Of Chattanooga Gas Company To Opt Into An Annual Review Of Rates Mechanism Pursuant To Tenn. Code Ann.§ 65-5-103(d)(6), this was a fully litigated administrative proceeding that successfully resulted in a settlement of the parties, including the Consumer Advocate, that was approved by the Commission.

The other specific open TPUC dockets for which legal work was performed and billed to the general billing matters of Mr. Luna's and Mr. Self's respective firms in 2019, such legal work may be summarized in a non-privileged manner as follows:

Docket No. 07-00224, Docket to Evaluate Chattanooga Gas Company's Gas Purchases and Related Sharing Incentives. Advice and counsel with respect to the Company's Triennial Review and the bidding and award for audit services.

Docket No. 18-00017, Petition Of Chattanooga Gas Company 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. Final wrap up of the rate case based upon the issuance of the final order and remaining implementation issues going forward.

Docket No. 18-00035, Chattanooga Gas Company Compliance Filing and Report. CGC's tax docket and the resolution of the two issues heard by the Commission. This was a fully litigated matter in 2019 including testimony, discovery, and a formal administrative hearing before the Commission.

Docket No. 18-00102, Chattanooga Gas Company's Actual Cost Adjustment Filing For The Period Of July 1, 2017 Through June 30, 2018. Advice and counsel regarding the Compliance Audit Report of the Actual Cost Adjustment component of the Purchase Gas Adjustment Rule for CGC.

Docket No. 18-00103, Chattanooga Gas Company Annual Incentive Plan Filing For The Twelve Months Ended June 30, 2018. Advice and counsel regarding the Staff audit report on CGC's Incentive Plan Account Filing and approval of the audit by the TPUC.

Docket No. 19-00078, Chattanooga Gas Company Annual Incentive Plan Filing For The Twelve Months Ended June 30, 2019. Advice and counsel regarding the Audit Staff's audit of CGC's Incentive Plan Account Filing and issuance of the Commission order approving the Compliance Audit Report.

Docket No. 19-00108, Rulemaking Proceeding to Promulgate Rules Related to Extension of Service to Contiguous Territory. While this is not a CGC-specific docket, since it is a rulemaking proceeding that might impact CGC, CGC has been monitoring this docket to see how the proceeding may impact CGC.

In addition to these CGC specific dockets, without addressing specific dockets or purposes and thus breaking privilege, it is important to note that not all of the legal work performed for CGC pertains to dockets in which CGC is a party or which is a generic docket potentially impacting CGC like a rulemaking proceeding. In this regard, CGC's attorneys monitor a number of TPUC dockets involving other regulated utilities and they may be called upon from time to time to provide legal counsel and advice regarding non-docketed matters that impact CGC's business operations. CGC's counsel may monitor other TPUC dockets to better understand what is occurring in those proceedings that might be precedential or otherwise useful to CGC in its proceedings with the Commission.

For example, as CGC has publicly acknowledged, CGC's ARM proposal was materially different from the Atmos ARM. CGC's inhouse team and outside lawyers investigated how the Atmos ARM worked and any issues that the Consumer Advocate and Commission Staff may have identified as matters requiring modification or improvement. In addition, CGC's team identified further issues that either would not work, were too cumbersome, or which seemed inapplicable to CGC's situation. All of this analysis over time led to CGC's ARM proposal in Docket No. 19-00047, which was ultimately modified by a stipulation that was approved by the Commission.

In addition, besides TPUC docketed matters, CGC's attorneys assist when requested with other business matters that impact the Company's regulated operations. For example, in developing a Cost Allocation Manual for CGC, from time to time questions arose for which legal advise was requested and drafts were reviewed for legal compliance issues.

Generally, CGC's outside attorneys work on all matters, but they divide the work as appropriate based upon the experience and value each brings to a topic to maximize efficiency and cost effectiveness. In some cases, only one attorney may be responsible for the majority of the work performed, with the other taking no role or only a minor role to consult or back up on the matter. Each docket is unique, and depending upon how a docket proceeds, roles may change over time as the case proceeds. The attorneys work together as appropriate and their work is coordinated and supervised by different Company employees who have operational responsibilities for dockets or parts of cases in addition to Ms. Wade who ultimately reviews and approves all legal invoices.

Response and objections by Counsel.

Chattanooga Gas Company Docket No. 20-00049 2019 Annual Rate Review

Consumer Advocate's Informal Discovery Request of July 14, 2020

QUESTION:

Refer to Exhibit GT-1, Schedule 20. Provide responses to the following questions:

- a. Regarding account 670805 'Meals and Entertainment' and account 670806, 'Meals and Entrainment 100 Percent'.
 - Provide a descriptive differentiation of the accounts and how AGLC determines which account is applicable for meals or entertainment expenses.
 - ii. Are both accounts eligible for IRS deductions?
 - 1. If so, what level of deductibility is assigned to these accounts?
 - iii. Regarding both accounts, provide the amount which will be claimed as deductible for each account for the Company's 2019 tax calculation (if applicable).
 - iv. Where any meals or entertainment expenses shown in these accounts associated with the following (if yes, provide the amount and state rather the Company recorded these costs below the line):
 - 1. Legislative receptions
 - 2. Athletic, country, golf, or hospitality clubs
 - 3. Social or recreational gatherings
 - 4. Providing meals or entertainment to the general public
 - 5. Entertainment facilities or dues/fees for business pleasure, recreation or social purposes
- b. Regarding account 670800 'Travel Expense' provide a breakdown of the types of expenses with totals recorded in the subaccount.
 - i. Provide the copies of support, including invoices for the months of March and September, 2019.

RESPONSE:

In responding to this request, CGC is responding based upon the name of the account used in the request and not the account number stated in the request, as the request used the incorrect account numbers for the identified account names.

a(i). See Attachment a for the Expense Report Guide on the selection between account 670856 Meals and Entertainment and 670857 Meals and Entertainment 100 Percent. The descriptions of the accounts relate to pre-TCJA laws. Meals and entertainment that were 50% deductible under pre-TCJA law were recorded to account 670856 and meals

and entertainment that were 100% deductible under pre-TCJA were recorded to account 670857. Post TCJA, both accounts are 50% deductible for tax purposes however the use of the accounts remains consistent with the guidance provided in Attachment a.

- a(ii). Yes, both accounts are eligible for IRS deductions. However, as noted in part a(i). above, deductibility for both accounts is now 50% of charges.
- a(iii). Tax deductible amounts are as follows for 2019: Account 670856 – \$358,409 Account 670857 - \$321,030
- a(iv). CGC objects to this request because it is overly broad, unduly burdensome, expensive, oppressive, and excessively time consuming, requiring the creation of data that does not presently exist, and not reasonably calculated to lead to the discovery of admissible evidence. CGC does not track costs in the manner being requested, and it would take a considerable amount of time to review each and every invoice/expense statement, seek clarification of the charges where necessary, and then create the requested documentation. Notwithstanding the foregoing and without waiving its objections, CGC states:

The Company provides each employee with the necessary training and responsibility for correctly completing a expense report to ensure that the charges are reimbursable per Company polices and properly coded. Furthermore, management review and approval of the expense report is required to ensure the expenses comply with the company's Expense Reimbursement Policy and Travel Policy, if applicable. Finally, the Southern Company Internal Audit organization performs routine selection and testing of expense reports to ensure Company policies and procedures are followed. Please see Attachment b and c for the Company's Travel Policy and Expense Reimbursement Policy.

b(i). CGC objects to this request as overly broad, unduly burdensome, expensive, oppressive, excessively time consuming, beyond the scope of the docket, and not reasonably calculated to lead to the discovery of admissible evidence. The parties to the *Stipulation and Settlement Agreement by and among Chattanooga Gas Company, The Consumer Advocate Unit of the Attorney General, The Chattanooga Regional Manufacturers Association, and Party Staff ("Settlement Agreement" or "Agreement") filed on July 26, 2019, in Docket No. 19-00047, that was approved by the Commission's Order Approving Settlement Agreement on October 7, 2019, specifically agreed upon a set of documentation that CGC was to provide with its filing that was to constitute the documentation in support of its case. That list of documentation does not include specific invoices that back up the numbers presented in the case that the Consumer Advocate is now attempting to review. Producing invoices as requested is a slippery slope, for if these invoices are appropriate then why not the entire 12 months of data, or worse, why not every invoice that ultimately supports every number in the filing. This is*

unreasonable, and such a level of investigation is unnecessary and without precedent. The statue that created the annual review of rates process did so for the purpose of allowing for "rate reviews and cost recovery in lieu of a general rate case proceeding before the commission." Tenn. Code Ann.§ 65-5-103(d)(1)(A) (emphasis added). Consistent with this more streamlined review, the Commission is granted only 120 days to conduct the entire proceeding. Tenn. Code Ann.§ 65-5-103(d)(6)(C). To seek back up information to the level of invoices is completely contrary to the spirit and intent of the statute and would constitute an audit. While an audit may be appropriate in a different context, it is entirely inappropriate in the context of CGC's ARM, which is an annual review of rates. The data presented in CGC's case is collected and recorded in the ordinary course of its business, and such business records do not require the support or detail to the level of invoices absent some allegation of fraud, misrepresentation, or some other extraordinary claim, which is not present in this request. The Consumer Advocate has CGC's records from its recent rate case as well as its budget, and the Consumer Advocate can certainly inquire as it has regarding material changes in numbers, but that inquiry cannot and should not include the actual invoices absent some extraordinary claim meriting that kind of audit level investigation. Notwithstanding the foregoing and without waiving its objections, CGC states:

The table below provides the charges to account 670855 Travel Expense for March and September 2019 by expense type.

DESCRIPTION	MARCH	SEP	TEMBER
AIRFARE	\$ 114,342	\$	132,671
AUTO	18,352		14,916
GROUND TRANSPORTATION	11,104		18,072
LAUNDRY			333
LODGING	106,809		137,062
MEALS	54		
MILEAGE	14,222		17,486
PARKING	5,368		6,479
TOLLS	25		142
TRAVELEXP	3,385		2,181
OTHER ACTIVITY	6,507		2,842
	\$ 280,168	\$	332,185

Similar to the direct assignment of time, travel expenses are direct assigned where applicable.

Witness: Gary Tucker

Manager, Regulatory Reporting

Southern Company Gas

Objections by Counsel

Expense Reporting User Guide on Expense Types *Reimbursable Expenses (Not to be used for P-Card transactions) Account # **Expense Type** *Automobile Mileage 670855 For miles traveled in personal vehicle for an approved business purpose 670840 *Other Employee Reim. Expense For reimbursement of an approved out-of-pocket expense such as safety boots *Transportation Subsidy 670888 For Atlanta employees using public transportation *Tolls-Personal Reimbursement 670855 For tolls paid out-of-pocket while on company business travel using personal vehicle **Travel Related** Account Air Travel 670855 Airfare and other expenses related to air travel such as baggage fees or in flight WIFI 670855 Automobile Rental Rental cars while on company business including fuel 670855 **Ground Transportation** Public transportation expenses including train (commuter/passenger), bus, taxi, limo, and tolls. Tips given to taxi or limo drivers should be coded under ground transportation. Laundry-Dry Cleaning 670855 Per company policy, if business trip is over one week 670855 Parking Parking fees associated with business travel **Travel Expense** 670855 Travel agency fees for booking business related travel 670855 Hotel/Lodging Hotel accommodations while on business travel. Tips assoiated with hotel staff such as bellmen should be coded under hotel/lodging. 670868 **Spousal Travel** Spousal travel must be pre-approved by VP level or above. See associated job aid for more information **Meals and Entertainment** Account Meals and Entertainment 100% Tax Deductible 670857 Meals and Entertainment that are primarily for the benefit of employees (not just officers) that are provided on an occasional basis for employee team building or moral Examples: Holiday celebrations, Dept-wide outings, Annual picnics, Birthday celebrations Meals and Entertainment consumed on business premises for the convenience of the employer Examples: Employee training, Overtime meals, Business meeting meals, Board meeting meals, Beverages/snacks provided in a break room, Beverages/snacks provided at a meeting primarily for the benefit of an exempt organization-United Way, March of Dimes, etc. Meals and Entertainment provided to an employee/s during an offsite "employee-only" training Meals and Entertainment 50% Tax Deductible 670856 Meals and Entertainment consumed while away from the employer's business premises, except if it is qualifying 100% deductible Includes taxes, tips and parking associated with the 50% deductible expense

Expense Type	Account #
Dues, Fees and Participation	Account
Civic Participation	670120
Social Service affairs, Civic/Social Associations, permits	
Assoc Club Dues Company	670800
Fees or dues for company-wide memberships	
Assoc Club Dues Employee	670805
Fees or dues for employee professional memberships	
Training and Registration Fees	670102
Training expenses such as instructor led or web based classes, fees for books and materials, registration fees	
for exams pertaining to professional certification	
Meeting/Conference Fees	670102
Registration fees for conferences and meetings. Any fee associated with paying for meeting room space	
Utility	Account
Regular Telephone Charges	670100
Charges associated with a land line	
Mobile/Cell Phone	670551
Charges associated with company mobile/cell phone	
Utilities	670050
Electric, gas, water, cable, internet	
Supplies, Postage, Shipping, Delivery, Subscriptions	Account
Shipping Expense	670104
For FedEx, UPS, DHL, etc. or supplies related to this expense	
Courier Services	670100
For pickup and delivery of items by a courier service. Sometimes used to deliver personal items to a terminated employee	
Postage	670104
Postage paid for general mailing through the USPS	
Subscriptions	670806
Newspapers, magazines and other periodicals for business use	
Supplies	670100
Supplies for the office or break room, other supply expenses such as from Staples, Wal-Mart, etc.	
Emergency Supplies	675120
Supplies purchased due to an emergency situation; not associated with everyday supplies	
Employee Uniforms	670127
Charges and fees associated with employee uniforms	
Outside Services-Printing	670201
Printing services outside of the company such as Kinko's	

Expense Type	Account #
Fleet	Account
Operate and Maintain Fleet Equ	67014
Fleet expenses such as maintenance, parts, and repairs	
Gasoline for fleet vehicles should only be purchased using the Fle	et Fuel Card
Maintenance & Repai	Account
Maintenance Meter Sets & Regul	64550
Maintenance expenses related to Meter Sets and Regulators of	ools and Supplies only
Maintenance of Gas Services	64570
Tools and Supplies Only related for repairs to customer services	
Repair & Maint of Mains	64520
Tools and Supplies Only related for repairs to Mains	
Service and Maint of Hand Tools	67512
Small Power and Hand tools repairs, maintenance, services and	
Fraud or P-Card Erro	Account
Fraudulent Transaction	13410
Her this group was true if the transportion is decreased to be freezedul.	ant on is being disputed. The benturill
Use this expense type if the transaction is deemed to be fraudul	
credit the expense on the following month's statement; use this	The state of the s
Personal Expense P-Card Error	13410
Per company policy, personal purchases are not to made using t	ie company P-Card. If the P-Card was used
in error, use this expense type.	
Other Expense Types	
Misc LNG Expense (LNG=Liquid Natural Gas)	60001
LNG equipment maintenance charges	52005
LNG Operation	62005
Supplies and charges related to LNG operations	62400
Compressor Station	62100
Supplies and charges related to compressor stations	67056
Service Awards	67056
Misc. employee service awards, retirement and recognition exposition	
Physicals	67052
Charges for employee physicals and other medical tests required	by regulatory agencies such as DOT
Miscellaneous Benefits	67052
Wilderian Coas Deficitios	07032
Flowers to employees for deaths/births, departmental expenses	like plagues or supplies for retirements
Marketing Expenses	66030
Marketing Dept. expenses (promotions, entertaining customers)	
Security	67017
Security expenses such as ID cards, alarm system fines and secur	
Property Tax Payments	23810
Application fees and permits related to property taxes	
Government Affairs Expense	44960
Government affairs expenses including travel and meals related	44500
Bank Serv Charge	67013
Fee for cashier's check or money order obtained from bank whe	
Accounting. Cash access on P-Card is for extreme emergencies a	

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Supply Chain Management – Travel Policy

Supplying value through teamwork

Purpose:

This document defines the Company's guidelines and employees' obligations, with regard to:

- Employees travelling together by air
- Using Preferred Suppliers for travel-related expenses
- Booking air travel
- Hotels/Lodging
- Ground transportation (including personal vehicles & traffic violations)
- Meals & entertainment
- Spousal travel
- Unused travel credits
- Foreign currency conversion
- Non-reimbursable expenses

Scope:

This policy and procedure applies to AGL Resources Inc. and its subsidiaries (the "Company") with the exception of Birdsall, Inc. and its subsidiaries. To the extent that any policy of any of the subsidiaries of the Company conflicts with this policy, the terms of this policy will take precedence over any subsidiary policy.

Specifically, this policy applies to all employees and to Company-related travel expenditures of non- employees (including spouses), where specifically mentioned in this policy; and to Suppliers, as may be defined in their contractual agreement with the Company. This policy does not apply to travel by Board members and does not apply to the reimbursement of employee travel in instances when the employee is traveling with a Board member on a private or chartered plane. The reimbursement of travel expenses of employees traveling with a Board member under these special circumstances must be approved by the appropriate Policy Committee member.

Policv:

- 1. All travel expenditures are subject to the provisions of the Expense Reimbursement Policy.
- 2. All employees who travel for Company business purposes must follow the outlined processes. It is each employee's responsibility to spend the Company's money in a prudent manner. It is the responsibility of each employee to comply with the provisions of this and other policies, as applicable, when making expenditures on behalf of the Company.
- 3. It is each manager's responsibility to ensure his/her employees are spending the Company's money in a prudent manner and that the travel expenditures of those employees approved by the manager are in accordance with applicable policies and procedures.
- 4. <u>Preferred Suppliers</u>: Employees shall use Preferred Suppliers when possible.
- 5. Air Travel: When booking air travel, the following apply:
 - a. Travelers or their Designated P-Card Assistant are responsible for making their own travel arrangements.

- b. <u>It is expected that the best pricing available</u> will be selected via the internet or phone (internet booking is strongly recommended to minimize costs). The best fares may not always appear on discount sites, therefore it is important to check the airline websites directly. Travelers are expected to take the lowest fare offered when making flight reservations, unless there is a valid business reason to take an alternate flight.
- c. Travelers will strive to book travel arrangements at least7 days in advance.
- d. Travelers who can receive a <u>special rate</u> for a specific airline and/or hotel because of a conference will provide the appropriate special rate code when making reservations.
- e. <u>All domestic air travel must be booked as coach class</u>, unless first class is the only seat remaining to the traveler's destination at the time required for travel, or if the price for first class travel is no more than the cost for traveling in coach class (verification required).
- f. International air travel must be booked as coach class for international flights with flight durations of less than 8 hours. For flights of more than 8 hours, business class is acceptable with manager approval (at least director level). Because of the combination of longer distances and the potential for unusual timing or circumstances, the ultimate decision between coach and business class remains with the traveler and his/her manager (deciding manager must be at the director level or above). Any exception to this coach-class travel requirement must be approved by vice president or above.
- g. <u>Travelers maintain all frequent flyer miles</u>. However, specific airlines will not be booked for the purpose of accumulating frequent flyer points if an alternative flight is available at a lesser cost.

6. Hotel & Lodging:

- a. Travelers must request hotels with reasonable room rates within a close proximity of the traveler's destination and obtain a guaranteed late arrival with their confirmation.
- b. If a traveler is billed by the hotel for a no-show, he or she must contact the hotel for validation before paying the charge.
- c. Travelers should book standard rooms, when available, unless the cost of an upgraded room does not exceed the cost of a standard room at the required location (verification required).
- d. Due to supply and demand, travelers can often receive lower rates by simply inquiring with the hotel's front desk staff upon check-in.

7. Ground Transportation:

- a. Travelers are expected to use the least expensive, reasonable method of transportation when traveling within a city.
- b. Hotel or conference shuttles will be used whenever possible.
- c. Mass transit is encouraged when available and convenient (i.e., when traveling from Atlanta's Hartsfield Jackson International Airport, travelers are strongly encouraged to use MARTA [transit system] to travel to Ten Peachtree Place).
- d. If the cost of taxi or car service is less than the cost of a rental car, then the taxi or car service is the preferred means of transportation.
- e. Travelers may rent a midsize car (as defined by the rental agency). When accompanied by clients or other travelers, travelers may rent a larger car, if needed.
- f. When two or more travelers are traveling together and a rental car is the least expensive reasonable mode of transportation available, no more than one car for each four people traveling together will be rented.
- g. Travelers will establish a profile with one of the preferred car rental companies to minimize duplicate work and waiting time.

- Car insurance shall be declined when a car rental is charged on the corporate P-Card.
- i. Costs incurred to refuel rental cars should be paid via the P-Card. Travelers are responsible for determining the most cost-effective refueling option.
- j. Use of Personal Car: Employees who use a personal car on Company business will be reimbursed for mileage calculated at the rate per mile as listed in PeopleSoft Expenses, which is periodically updated to IRS-approved rates. Reported mileage should reflect actual mileage traveled during a reporting period based on odometer readings (use of average mileage per reporting period is not acceptable).
- k. Traffic Violations: Travelers are personally liable for fines and penalties imposed for traffic law violations while operating rental or personal vehicles on Company business. The Company will not be responsible for these fines.

8. Meals:

- a. Travelers are responsible for exercising appropriate business judgment regarding meal expenses incurred during the course of travel.
- b. Prudent financial judgment should be used when selecting dining establishments and menu selections in order to manage expenses as reasonably as possible during the course of travel.
- c. When paying for more than one employees' meal, the highest ranking employee shall use his or her P-Card to pay for the meal. This employee shall be responsible to document all other people who attended the meal and that all expenses incurred are acceptable to the Company.
- d. Exception: The requirement to charge meals and entertainment expenses to the P-card of the higher ranking employees does not apply where the expenses are for lobbying purposes; in such a situation a company employee who is a registered lobbyist should charge such expenses to his or her P-card, regardless of whether higher ranking employees are present, so that such expenses may be properly accounted for and disclosed as may be required by law.

9. Spousal Travel:

- a. Spousal travel will not be paid for by the Company, unless the spouse's presence serves a valid Company business purpose. Spousal travel must be pre-approved for employees at all levels by the next level management (i.e., vice president or above).
- b. Expenses should be recorded to general ledger account number 670868 "Travel-Spouse" when the P-Card statement is reconciled. This will be an override entry since the account will populate automatically with the travel account number (i.e. air travel) that the expense would be coded to if it were an expense for the employee.
- c. Invoices that contain both employee and spouse expenses (e.g. AGA dinners) should be coded to change the spouse's expense to account number 670868 "Travel-Spouse."
- d. Approved spousal travel will be treated as compensation to the employee and will appear as wages on the employee's W-2.
- e. The employee's wages will be grossed up for FICA, Medicare, Federal Income Tax and State Income Tax so that the inclusion of approved spousal travel in income as additional wages will have no tax impact on the employee.
- 10. <u>Unused Travel Credits</u>: Travelers are responsible for ensuring that all unused travel documents, e.g., airline tickets, hotel reservations, etc. are returned as quickly as possible to the issuer to ensure the Company receives any applicable credit.
- 11. <u>Foreign Currency Conversion</u>: Travelers will allow foreign transactions to be converted into U.S. dollars automatically via the P-Card to receive the best conversion rate. When reconciling P-Card statements, international transaction fees will be allocated to the travel account and receipts will support the posted transaction. Please check the currency conversion website posted on the Travel Booking section of the Supply Chain page on The Source to verify the currency rate.

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- 12. Non-reimbursable Expenses: The following expenses are specifically identified as non-reimbursable:
 - a. Adult entertainment.
 - b. Travel-related child or pet care expenses while on normal business travel.
 - c. Accidents, repairs, maintenance and insurance for personal cars.
 - d. Personal entertainment such as movies, tours, sport events while traveling or otherwise, that does not serve a reasonable business purpose.
 - e. Clothing and formal attire rental are not allowable as Company expenses, unless the rental has been authorized by management in order to serve a business purpose.
 - f. Cost of replacing an item lost or stolen during Company travel, such as purses, wallets, luggage or clothing.
 - g. Optional travel or baggage insurance.
 - h. Newspaper, magazines, publications purchased during business travel.
 - i. Use of optional amenities such as health club, gift shops, sauna, and in-room movies.
 - j. Personal toiletries such as deodorant, hairspray, chewing gum, snacks and other items while on Company business.
 - k. Toll road and other transportation fees incurred by travelers in everyday business commute.
 - l. Laundry for Company trips of less than one week.
 - m. Items from hotel mini-bars.

Resources:

http://pipeline.corp.aglrsc.com/departments/supply-chain/p-card/Pages/default.aspx

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CORPORATE POLICY AND PROCEDURE

Effective Date: 11-20-2014 Prepared by: Sharon Beck

Title: Expense Reimbursement Policy Approved by: Ethics & Compliance Committee

Purpose:

The purpose of this document is to outline the circumstances under which the Company will reimburse employees for expenses on behalf of the Company, including gifts and entertainment-related purchases.

This policy ensures that reimbursable expenditures meet the rules of the Internal Revenue Service and Company requirements.

Scope:

This policy and procedure applies to AGL Resources Inc. and its subsidiaries (the "Company"). To the extent that any policy of any of the subsidiaries of the Company conflicts with this policy, the terms of this policy will take precedence over any subsidiary policy.

Policy:

- 1. The Company will reimburse employees for reasonable and necessary expenses that are incurred while engaged in conducting Company business and that are properly supported with documentation.
- 2. All gifts and entertainment-related purchases must have a reasonable business purpose as described in the Company's Code of Conduct and Ethics. All attendees of business-related entertainment paid for by the Company as well as their titles and the business purpose of the entertainment must be documented.
- 3. All travel, entertainment, office supplies, and other business expenses will be paid for by using the Company P-Card when accepted by the merchant.
- 4. The following purchases should be made with the Company P-Card:
 - a. Catering and approved overtime meals
 - b. Travel expenses including lodging, meals and air travel
 - c. Safety glasses, uniforms and safety shoes
 - d. Subscriptions, magazines and newspapers
 - e. Registration fees for meetings
 - f. Oil and parts for fleet equipment (only for Company vehicles)
 - g. Minor transportation equipment repairs (only for Company vehicles)
 - h. Office supplies such as stationery items, and office equipment
 - i. Utility bills
 - j. Miscellaneous items such as ice, straw and seed
 - k. Calibrations and repairs of equipment which have an estimated repair cost of \$2,000 or less and are not performed on Company property
 - 1. Cleaning of fire retardant clothing
 - m. Purchase of Maintenance, Repair and Operating supply (MRO) materials that do not conflict with the supply chain policy (no gas distribution materials)
 - n. Emergency purchases of materials or services as defined in the **Supply Chain Policy**.
 - o. Memberships for charitable and social organizations or for civic, social or fraternal associations are allowed on a P-Card, assuming that management has approved participation in the organization and the expenditure is documented as a membership.

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- 5. Except as expressly set forth in Section 5(f), the following purchases shall not be made using the Company P-Card:
 - a. Gas distribution materials
 - b. Laptop computer, desktop computer, or other IT equipment
 - c. Computer software
 - d. Gift Cards of any type
 - e. Charitable contributions of any sort
 - f. Notwithstanding the forgoing, the Company may authorize certain departments with responsibility for directing funds from AGL Philanthropic Support, or directing funds from the Nicor Gas Corporate Giving Program, to make P-Card purchases for the purchases set forth in Section 5(e) above. Such purchases will be made with a special card issued to the departments expressly for this purpose.
- 6. It is inappropriate to use the P-Card for the following purchases and such purchases are non-reimbursable:
 - a. Adult entertainment
 - b. Travel-related child or pet care expenses while on normal business travel
 - c. Accidents, repairs, maintenance, and insurance for personal cars
 - d. Personal entertainment such as movies, tours or sports events, while traveling or otherwise, that does not serve a reasonable business purpose
 - e. Clothing and formal attire rental unless the rental has been authorized in advance by management in order to serve a business purpose
 - f. Replacement of items lost or stolen during Company travel, such as purses, wallets, luggage or clothing
 - g. Optional travel or baggage insurance
 - h. Newspapers, magazines or publications purchased during business travel
 - i. Fees for the use of optional amenities such as health club, gift shops, sauna and in-room movies
 - j. Personal items and toiletries such as deodorant, hairspray, chewing gum, snacks and other items while on Company business
 - k. Toll road and other transportation fees incurred in an employee's everyday business commute
 - 1. Laundry for Company trips of less than one week
 - m. Items from hotel mini-bars
 - n. Gift cards or any cash equivalent for internal or external use.

7. Employees' Responsibilities:

- a. Employees are responsible for spending the Company's money prudently and in accordance with acceptable business practices and the Company's Code of Conduct and Ethics.
- b. Employees shall be required to submit an expense report in PeopleSoft for approval for the expenses that have been incurred on the Company's behalf. This report shall be submitted no later than the 15th of the month after the expense has taken place or the trip has concluded.
- c. Employees shall accurately report and describe all expenses for which they are requesting reimbursement.
- d. In order to be reimbursable, all other expenses, except for mileage as identified below, shall have the appropriate supporting documentation, usually in the form of a receipt or electronic document. This documentation will be kept as a record with the report.
- e. Personal Vehicle Mileage:
 - i. Every mileage expense requires a valid business reason. Details should be included in the business purpose of the expense report.
 - ii. Miles are reimbursed at the IRS standard mileage rate.
 - iii. Mileage can only be reported for reimbursement to the extent that it exceeds the employee's normal commuting mileage. Only the excess of the miles traveled over the normal commuting mileage will be reimbursed.

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f. Misrepresentation of information on an expense report by the employee may result in disciplinary action up to and including dismissal from the Company.

8. Managers' Responsibilities:

- Managers shall be responsible for the approval of the expenses of their employees.
 Expenses shall be approved no later than the 25th of the month during which an expense report was submitted.
- b. Managers should ensure that their employees understand Company policy with respect to reimbursable expenses.
- c. Managers will not approve any charges that are unnecessary or unreasonable, or that are not supported with verification documentation. In determining whether an expense is reasonable or necessary, managers may consider the expense type and the location where the expense was incurred.
- d. Managers must ensure that all entertainment-related purchases are in accordance with the Company's Code of Conduct and Ethics.
 - i. The occasional exchange of gifts, meals, and entertainment is a common business practice intended to build goodwill and sound working relationships. However, it's important to use good judgment when determining the appropriateness of a gift, meal or entertainment.
 - ii. Employees may accept gifts, meals and entertainment from Company business professionals that are voluntarily offered, for a legitimate business purpose, are reasonable, and do not compromise business judgment.
 - iii. On occasion, we should make reasonable reciprocation, as appropriate, at the Company's expense to prevent the appearance of obligation.
 - iv. Because we always strive to act with integrity in all our business dealings, the Company prohibits any gifts, meals or entertainment that could compromise sound judgment or the ability to make objective and fair business decisions.
 - v. Money, in any form, is never an acceptable gift.
- e. The employee at the highest level is responsible for payment of meal and entertainment-related expenses in closing out the charges incurred.

Exception: The requirement to charge meals and entertainment expenses to the P-card of the higher ranking employees does not apply where the expenses are for lobbying purposes; in such a situation a Company employee who is a registered lobbyist should charge such expenses to his or her P-card, regardless of whether higher ranking employees are present, so that such expenses may be properly accounted for and disclosed as may be required by law.

Resources:

- a. Refer to Expense Report Procedure on The Source for additional details.
- b. Mileage Reimbursement Examples:
 - i. If the normal commuting round trip is 20 miles, and the employee travels 60 miles for business to another location instead of to their regular work location, only the incremental 40 miles are reimbursable.
 - ii. An employee normally works at the Gwinnett Service Center. Their commute from home to work is 20 miles round trip. They are required to attend an all-day meeting at Ten Peachtree Place. The distance from their home to Ten Peachtree Place is 40 miles roundtrip. The Company will reimburse the employee for the 20 miles in excess of their normal commute.
 - iii. An employee normally works at Ten Peachtree Place. They come to work at Ten Peachtree Place, then go to the Call Center in Riverdale before returning home. The mileage from Ten Peachtree Place to the Call Center is reimbursable and the difference between the mileage from Ten Peachtree Place to their home and the Call Center to their home is reimbursable.

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2019

Maycreate's campaign expense report for Chattanooga Gas.

Project	Service Type	Project Hours - 2019	-	gency Fee \$100/hr) - 2019	Print oduction - let 2019	Media Rate - Gross 2019	Tota	l Fees 2019
ACE Stand Up Banners	Graphic Design	23	\$	2,300	\$ -	\$ -	\$	2,300
Billboards	Graphic Design	28.25	\$	2,825	\$ 4,065	\$ 51,808	\$	58,698
Campaign Creative Exploration	Strategy	114.25	\$	11,425	\$ -	\$ -	\$	11,425
Campaign Photography	Photography	64	\$	6,400	\$ -		\$	6,400
Digital Display Banners	Graphic Design	50.25	\$	5,025	\$ _	\$ -	\$	5,025
Direct Mail piece - 6x9	Graphic Design	20.5		2,050	\$ 3,721		\$	5,771
Email Design	Graphic Design	8	\$	800	\$ -	\$ -	\$	800
Guerilla Marketing Ideas - 811 Day	Strategy and Implementation/installation	122.5	\$	12,250	\$ 333		\$	12,583
Landing Page Design, NiCor/Virginia/Atlanta Light and Gas	Graphic Design	30	\$	3,000	\$ -	\$ -	\$	3,000
Media Planning	Media Planning	38	\$	3,800	\$ -	\$ -	\$	3,800
Radio PSA	Broadcast Production	9.25	\$	925	\$ -	\$ -	\$	925
Southern Company Gas Account Maintenance	Account Maintenance	113.75	\$	11,375	\$ -	-	\$	11,375
Southern Company Gas Digital Campaign Management and Analysis	Analysis and Optimization	89	\$	8,900	\$ -	\$ -	\$	8,900
TV PSA	Strategy	35	\$	3,500	\$ 	\$ -	\$	3,500
		745.75						
						Total Marketing Expence	\$	134,502
						Total Paid	\$	(159,712)
						Variance	\$	(25,210)

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Southern Gas
TV PSA:30 Sec.
"Home Safe"
5/22/19. (Revised Script)

<u>Video</u> <u>Audio</u>

(Open on a locked-off shot. Camera slowly pushes in on an object. Viewer can't really tell what it is at first, until we get closer to it.)

<u>SFX:</u> (Viewer hears sounds at a distance. Not sure what they are but it sounds like digging. Continues for about :24 seconds.)

<u>Anner. (VO):</u> This....is an important message for Chattanooga homeowners and their neighbors. (<u>Slight Pause</u>)

It concerns your safety. (Pause)

(As the camera pulls closer to the object The sounds increase in intensity.)

It's also a way to reduce harmful incidents or possibly expensive accidents.

And it only takes a few minutes.

In fact...it's the law. (Pause)

(Anncr. pauses and all you hear are the SFXs. Pause lasts a couple of seconds. The spade is thrust into the ground one last time. *SFX* is enhanced w/reverb. We freeze the action.)

Next time you have a project.... (<u>Pause</u>)
Please call <u>eight-one-one</u> before you dig!

(Camera's tight on the blade as the <u>super</u> **CALL 811 BEFORE YOU DIG** appears on it.)

This message of safety is brought to you by (<u>Station's call letters</u>) and Chattanooga Gas.



Melanie, teaching gardening in East Brainerd



David, building a new fence in Woodmore



Hunter, spreading gravel on the South Side



WE MADE THE CALL. WILL YOU?

Every day, more Chattanoogans are calling 811 before they dig. They're doing their part. How about you? Why not reduce the risk of harmful incidents, expensive accidents, and natural gas outages for you and your neighbors? Call 811 before you dig.

To see why your call is important, visit:

chattanoogagas.com



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2207 Olan Mills Drive | Chattanooga, TN 37421

DIGGING SOON?

Any residential project that involves digging, no matter how big or how small, requires a call to 811.



MAKE THE CALL.

Call 811 and provide your address, project type, and approximate dig date. It takes less than two minutes.



WAIT FOR THE MARKS.

Within 3 working days, utility companies will spray or flag your yard, allowing you to avoid areas where lines are present.



DIG WITH SAFETY AND CONFIDENCE.

Now you can tackle your project without causing undue harm, service interruptions, or unwanted expenses.

chattanoogagas.com/safety/call-before-you-dig





@ChattanoogaGas



@ChattanoogaGas1



CALL AT LEAST 3 WORKING DAYS BEFORE YOU PLAN TO DIG.

As many as 7 different systems of cables and pipes are buried beneath the surface of your property-some you may not even be aware of. Last year alone, Chattanoogans hit and punctured natural gas lines over 225 times, causing harmful incidents, expensive accidents, and unnecessary outages.

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Southern Gas Direct Mail Postcard (4-Color) "Make The Call" 4/26/19

Front of Card:

Headline: We made the Call.

Will You?

Copy: Every day, more Chattanoogans are calling 811 before they dig. They're doing their

part. How about you? Why not reduce the risk of harmful incidents, expensive accidents, and gas outages for you and your neighbors. Call before you dig.

To see why your call is important, visit:

chattanoogagas.com

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I MADE THE CALL. WILL YOU?

-Dominique, planting a tree in Bella Vista



FIND OUT WHY

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I MADE THE CALL. WILL YOU?

-David, building a new fence in Woodmore







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-Andy, digging footers in Downtown Chattanooga





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-Melanie, teaching gardening in East Brainerd





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-Mark, planting a garden on Missionary Ridge





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-Hunter, spreading gravel on the South Side





and New Hork Elmoa

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DIY



Have You Made the Call to 811?

Find out why Chattanoogans are picking up their phones to call 811 before they dig.

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DIY





Sponsored by A Chattanooga Gas

Homeowners: 3 Steps To Take **Before Any Digging Project**

Find out how you can avoid harmful accidents, costly repairs, and natural gas outages by calling 811 before you dig.

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DIY





Sponsored by A Chattanooga Gas

Chattanoogans: 3 Steps For Safer Digging At Home

Learn how starting with a call to 811 supports a safer digging community and reduces the risk of natural gas outages.

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DIY





Sponsored by A Chattanooga Gas

Chattanoogans: Always Call 811 Before You Dig.

The few minutes it takes to call before you dig could save you hours of work and reduce the risk of costly repairs.

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DIY





Sponsored by A Chattanooga Gas

Homeowners: Call 811 And Reduce Costly Accidents

Every day, Chattanoogans are calling before they dig, preventing natural gas outages for themselves and their neighbors.

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DIY



Sponsored by A Chattanooga Gas

Planning Your Next Digging Project? Call 811 First.

Up to 7 utility systems may run below ground on your Chattanooga property. Learn how to get a free inspection & marking.

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HWY 153 742



Chattanooga Gas



E CALL. Particular of the content o



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HWY 153 742



Chattanooga Gas



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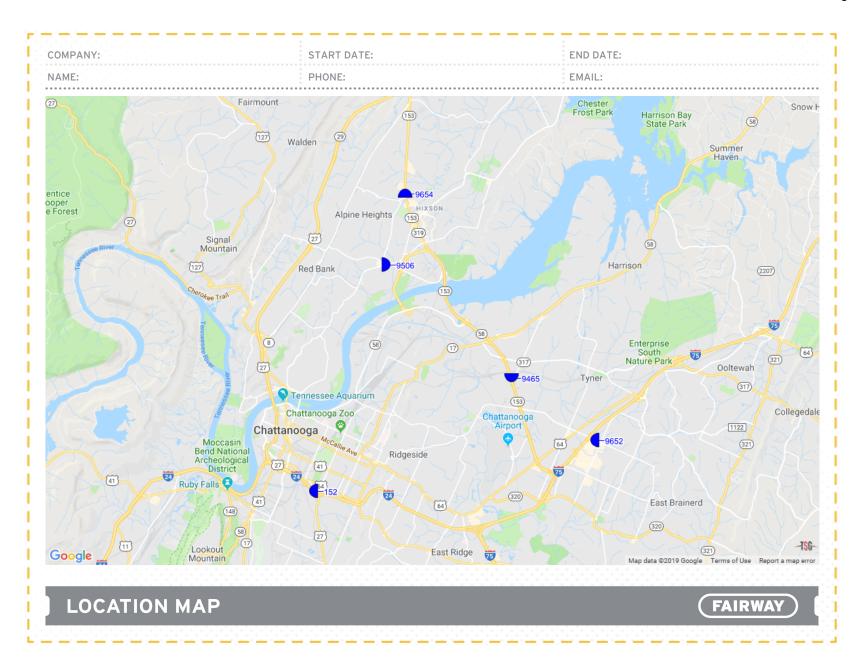
nattanooga Gas



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THE CALL. YOU? YOU DIG.





COMPANY:				START DATE:	END DATE:			
NAME:				PHONE:	EMAIL:			
con	#	Unit	Location Description		Facing	Size	Ill Hours	Weekly 18+ Imp.*
Bulleti	ins							
	1	9654	Hwy 153 600 ft N/O Gadd Rd WS F/S - 1st		S	10.5x36 Can	18	0
•	2	9465	Hwy 153 742 ft N/O Jers	ey Pike ES F/N - 1st	N .	14x48	18	185,818
•	3	152	I 24 175 ft W/O Rossville	Blvd NS F/E - 1st	E :-::	14x48	18	414,313
	4	9506	Hixson Pk 350 ft N/O As	hland Terr SS F/W - 2nd		14x48	18	108,362
4	5	9652	Shallowford Rd 0.19 mi W	/O Gunbarrel Rd SS F/E - 2nd	E	10.5x36 Can	12	0

^{*} The Geopath Audience Location Measurement | system data is provided by the Traffic Audit Bureau for Media Measurement, Inc. New York, New York © Copyright 2018, All Rights Reserved

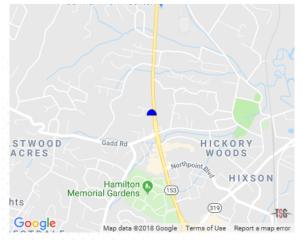
LOCATION LIST

FAIRWAY



MEDIA TYPE: Bulletin CITY: Chattanooga COUNTY: Hamilton STATE: TENNESSEE





Direction Facing: **S**Hours of Illumination: **18**

Size: 10.5x36 Can State: TENNESSEE Zip Code: 37343 Latitude: 35.143396

Longitude: -85.249399

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FAIRWAY OUTDOOR ADVERTISING 423-756-4200 fairwayoutdoor.com 18 West 28th St, Chattanooga, TN 37408

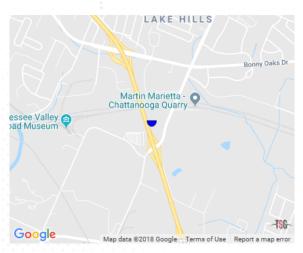


9465 • Hwy 153 742 ft N/O Jersey Pike ES F/N - 1st

MEDIA TYPE: Bulletin CITY: Chattanooga COUNTY: Hamilton STATE: TENNESSEE



This Southbound bulletin reaches consumers traveling to and from communities such as Hixson, Soddy Daisy, Highway 58, East Chattanooga, Brainerd, and Bonny Oaks connecting them with I-75 or the Airport. This is the most frequently traveled state highway in the Chattanooga DMA serving upwards of 140,000 vehicles daily.



Geopath Number: **30585379**

Total Weekly Impressions: 185,818*

Direction Facing: **N**Hours of Illumination: **18**

Size: **14x48**

State: TENNESSEE
Zip Code: 37421
Latitude: 35.06716
Longitude: -85.19529

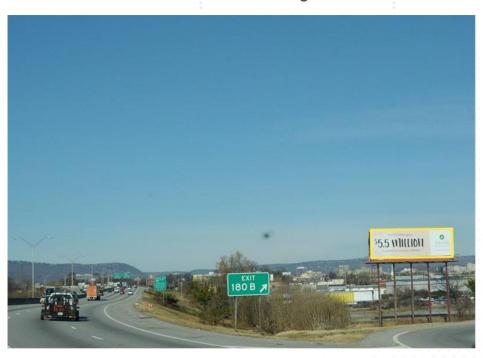
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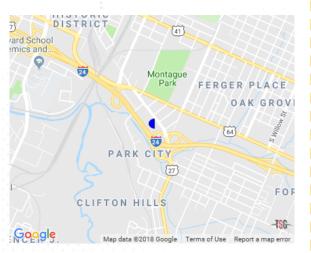


152 • I 24 175 ft W/O Rossville Blvd NS F/E - 1st

MEDIA TYPE: Bulletin CITY: Chattanooga COUNTY: Hamilton STATE: TENNESSEE



I-24 is the interstate that runs directly through the city connecting Nashville, TN with I-75 and Atlanta, GA. It is also heavily traveled by people who work in the downtown area but live in the suburbs East and South of the city. During rush hour, traffic is at a near standstill, giving consumers great visibility to your message. This bulletin reads to inbound commuters.



Geopath Number: 360316

Total Weekly Impressions: 414,313*

Direction Facing: **E**Hours of Illumination: **18**

Size: 14x48

State: **TENNESSEE**Zip Code: **37408**Latitude: **35.020275**

Longitude: -85.29554

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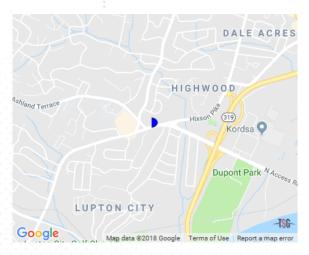


9506 • Hixson Pk 350 ft N/O Ashland Terr SS F/W - 2nd

MEDIA TYPE: Bulletin CITY: Chattanooga COUNTY: Hamilton STATE: TENNESSEE



This outbound bulletin reads to the intersection of Hixson Pike and Ashland Terrace. Here, you will reach consumers traveling to Hixson or Lakeshore from the downtown area via Hixson Pike or US27/Ashland Terrace. This is a major intersection in the South Hixson community.



Geopath Number: **30781397**

Total Weekly Impressions: 108,362*

Direction Facing: **W**Hours of Illumination: **18**

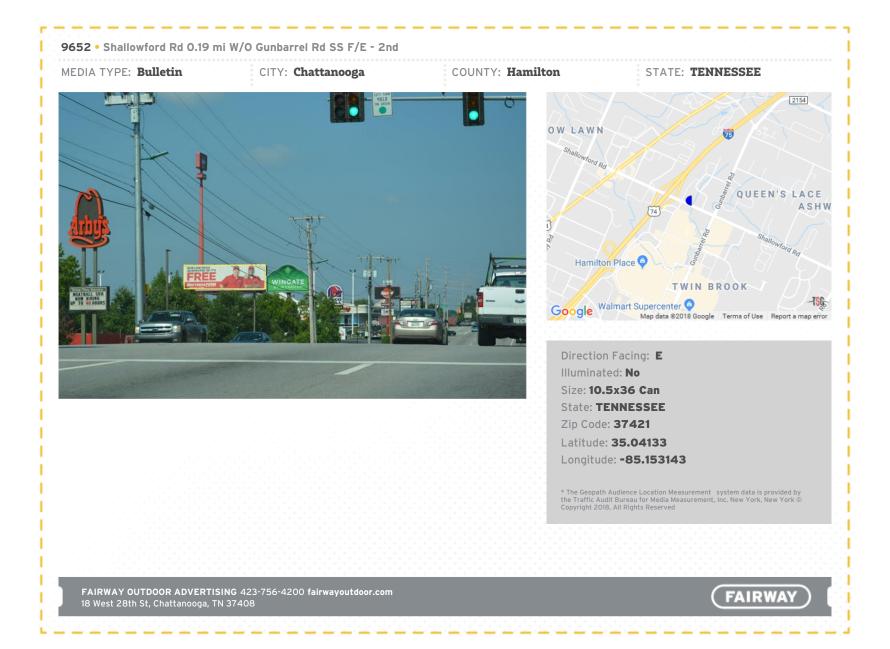
Size: **14x48**

State: **TENNESSEE**Zip Code: **37415**Latitude: **35.113899**Longitude: **-85.258969**

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I MADE THE CALL. WILLYOU? CA

-Mark, planting a vegetable garden at home



EVERY DAY, MORE CHATTANOOGANS ARE CALLING 811 BEFORE THEY DIG.

They're doing their part. How about you? Why not reduce the risk of harmful incidents, expensive accidents, and natural gas outages for you and your neighbors? Call 811 before you dig.



I MADE THE CALL.
WILL YOU? COM

-Hunter, spreading gravel for a driveway



EVERY DAY, MORE CHATTANOOGANS ARE CALLING 811 BEFORE THEY DIG.

They're doing their part. How about you? Why not reduce the risk of harmful incidents, expensive accidents, and natural gas outages for you and your neighbors? Call 811 before you dig.





-Dominique, planting a fig tree in her yard



EVERY DAY, MORE CHATTANOOGANS ARE CALLING 811 BEFORE THEY DIG.

They're doing their part. How about you? Why not reduce the risk of harmful incidents, expensive accidents, and natural gas outages for you and your neighbors? Call 811 before you dig.



I MADE THE CALL.

-David, building a fence in his backyard



EVERY DAY, MORE CHATTANOOGANS ARE CALLING 811 BEFORE THEY DIG.

They're doing their part. How about you? Why not reduce the risk of harmful incidents, expensive accidents, and natural gas outages for you and your neighbors? Call 811 before you dig.



-Andy, digging footers for new homes



EVERY DAY, MORE CHATTANOOGANS ARE CALLING 811 BEFORE THEY DIG.



-Melanie, planting a vegetable garden



EVERY DAY, MORE CHATTANOOGANS ARE CALLING 811 BEFORE THEY DIG.



-Melanie, gardening in East Brainerd



EVERY DAY, MORE CHATTANOOGANS ARE CALLING 811 BEFORE THEY DIG.



-Andy, digging footers on the South Side



EVERY DAY, MORE CHATTANOOGANS ARE CALLING 811 BEFORE THEY DIG.





-Dominique, planting a tree in East Brainerd



EVERY DAY, MORE CHATTANOOGANS ARE CALLING 811 BEFORE THEY DIG.





EVERY DAY, MORE CHATTANOOGANS ARE CALLING 811 BEFORE THEY DIG.



-Hunter, spreading gravel on the South Side



EVERY DAY, MORE CHATTANOOGANS ARE CALLING 811 BEFORE THEY DIG.



-Mark, planting a garden on Missionary Ridge



EVERY DAY, MORE CHATTANOOGANS ARE CALLING 811 BEFORE THEY DIG.





-Dominique, planting a fig tree in her yard



EVERY DAY, MORE CLEVELANDERS ARE CALLING 811 BEFORE THEY DIG.



-Hunter, spreading gravel for a driveway



EVERY DAY, MORE CLEVELANDERS ARE CALLING 811 BEFORE THEY DIG.



-David, building a fence in his backyard



EVERY DAY, MORE CLEVELANDERS ARE CALLING 811 BEFORE THEY DIG.



-Andy, digging footers for new homes



EVERY DAY, MORE CLEVELANDERS ARE CALLING 811 BEFORE THEY DIG.



-Melanie, planting a vegetable garden



EVERY DAY, MORE CLEVELANDERS ARE CALLING 811 BEFORE THEY DIG.



-Mark, planting a vegetable garden at home



EVERY DAY, MORE CLEVELANDERS ARE CALLING 811 BEFORE THEY DIG.



-Hunter, spreading gravel for a driveway



MORE & MORE OOLTEWAH RESIDENTS ARE CALLING 811 BEFORE THEY DIG.



-Melanie, planting a vegetable garden



MORE & MORE OOLTEWAH RESIDENTS ARE CALLING 811 BEFORE THEY DIG.





-Dominique, planting a fig tree in her yard



MORE & MORE OOLTEWAH RESIDENTS ARE CALLING 811 BEFORE THEY DIG.



I MADE THE CALL.

-David, building a fence in his backyard



MORE & MORE OOLTEWAH RESIDENTS ARE CALLING 811 BEFORE THEY DIG.



-Andy, digging footers for new homes



MORE & MORE OOLTEWAH RESIDENTS ARE CALLING 811 BEFORE THEY DIG.



-Mark, planting a vegetable garden at home

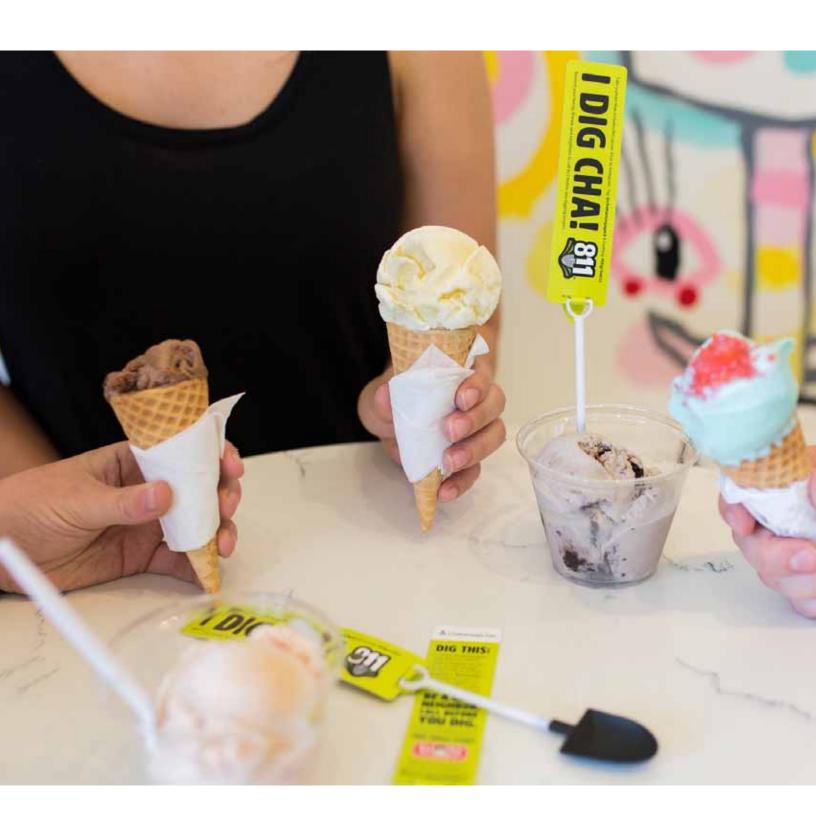


MORE & MORE OOLTEWAH RESIDENTS ARE CALLING 811 BEFORE THEY DIG.













newschannel9.com

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93°



WTVC LIVE Broadcast

LIVE



WHAT'S NEW

WTVC SCHEDULE



•

UP NEXT

MAINLY

IT'S VE

HEAT II

WTVC LIVE Broadcast

Latest Weatherca

live now

40 minutes ago

encourages homeowners and contractors to follow the below safe digging guidelines and

all Refore You Dig: When starting an outdoor project involving digging, customers are to make contacting Tennessee 811 by dialing 811 part of their plans. Calls to the free locating service should be made three days in advance. The requests to have utility operators mark underground facilities, including natural gas, electric, water, sewer, telephone and cable lines, can be made 24 hours a day, seven days a week.

Allow the Required Time for Marking: After calling 811, wait the required time to have underground utility lines marked before digging. The approximate location of underground utility lines will be marked with color-coded spray paint, flags or stakes that correspond to the utility. The color used for natural gas is yellow.

Respect the Marks: Only use hand digging tools to uncover the area carefully around a utility when you need to dig close by.

Excavate Carefully: Make sure the marks remain visible during the project. If the lines are damaged or removed, customers are encouraged to call 811 to have lines re-marked.

If a natural gas line is damaged accidentally or the distinctive rotten-egg odor associated with natural gas is present, call 911 or the Chattanooga Gas 24-hour emergency phone line at 1-866-643-4170 from a safe location. Do not operate any machinery or equipment that might cause a spark or open flame.

For more information about natural gas safety, visit https://chattanoogagas.com/safety/811.









Heritage Funeral Home- East Brainerd Chapel Chattanooga's Funeral Home of Choice for over 26 years (423) 894-2010 heritagechattanooga.com

August 9, 2019

Millions Of Dollars Earmarked For Tennessee's Rural Communities

To help strengthen and expand workforce development programs in Tennessee's rural counties, the Tennessee Workforce Development Board approved a \$3 million investment to support Governor Bill ... (click for more)

August 9, 2019

Chattanooga Gas Recognizes 811 Day And Safe Digging Practices On 811 Day

Chattanooga Gas promotes safe-digging practices year-round, and to celebrate 811 Day (recognized nationally on Aug. 11), it reminds residents to call 811 before you dig. Whether a professional ... (click for more)

August 9, 2019

The Dixie Group Announces Letter Of Intent To Sell And Lease Santa Ana **Facility**

The Dixie Group, Inc. Friday announces it has entered into a letter of intent to sell to CenterPoint Properties Trust the company's Santa Ana, Ca. facility. The transaction is subject to entering ... (click for more)









Docket No. 20-00049 CGC Response CA-2-8

Attachment G

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Business

EnableComp To Expand Operations In Middle Tennessee

OVERNOR LEE, COMMISSIONER ROLFE ANNOUNCE ENABLECOMP LLC TO EXPAND OPERATIONS IN MIDDLE TENNESSEE Franklin-based company will establish facility in Tullahoma EnableComp will create 200 jobs in Coffee County during next five years Company processes complex medical claims for more than 800 healthcare providers NASHVILLE, Tenn. -Tennessee Governor Bill Lee, Department ... (click for more)

Millions Of Dollars Earmarked For **Tennessee's Rural Communities**

To help strengthen and expand workforce development programs in Tennessee's rural counties, the Tennessee Workforce

Breaking News

Lawsuit Filed Seeking To Void The Downtown Business Improvement District (BID)

A Chancery Court lawsuit has been filed seeking to void the controversial Business Improvement District, which was passed last Tuesday by the City Council. It was brought by members of the Paty family who own property along Patten Parkway and by William Wise, owner of property near the riverfront. Both had repeatedly expressed their opposition to the BID and asked to be taken ... (click for more)

REAL ID Tennessee Driver's Licenses Now Available At County Clerk's Courthouse Office

The Tennessee Department of Safety has completed staff training enabling the County Clerk's 201 Courthouse office to

Roy Exum: We Must Keep Trying

I am constantly remined that every time I point out "how the strong man stumbled, or how the 'doer of deeds' might have done them better," three of the fingers on the hand I use to point are, in fact, pointed

Opinion

Earl Freudenberg: Remembering **Harris Downey**

I was raised in White Oak before moving to North Chattanooga at the age of 13. I spent a lot of time aggravating business owners along Dayton Boulevard. There was the drug store with cherry cokes, hardware store with tall tales around the coal stove. Swaffords Grocery with unusual Christmas decorations, Cooley's Clothing with Jim Cooley telling his stories, the barber shop where ... (click for more)

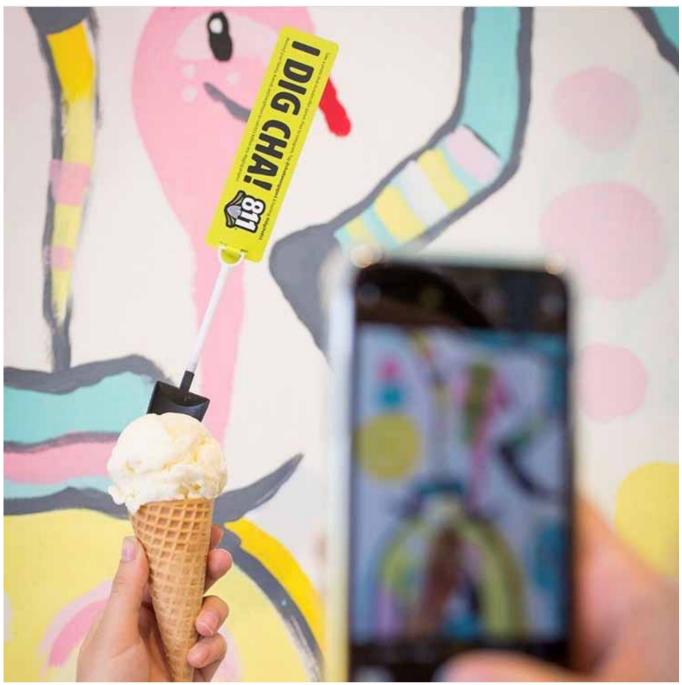


Posts

Docket No. 20-00049 CGC Response CA-2-8 Attachment G Page 9 of 13



chattanoogagas1













Liked by alex_de_hart and 14 others

chattanoogagas1 Chattanoogans are beginning to discover #idigcha811 shovels planted in downtown's parks, and they're celebrating a safer digging... more Posts

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chattanoogagas1











chattanoogagas1 Today is National 811 Day, and cities around the country are emphasizing the importance of calling 811 before any digging project. To help spread the word here in Chattanooga, we've planted eight hundred and eleven #idigcha811 shovels with bright green tags throughout downtown's parks. Find one and get a free scoop of @clumpies ice cream. #DigSafe #national811day Learn More: http://bit.ly/CGC811

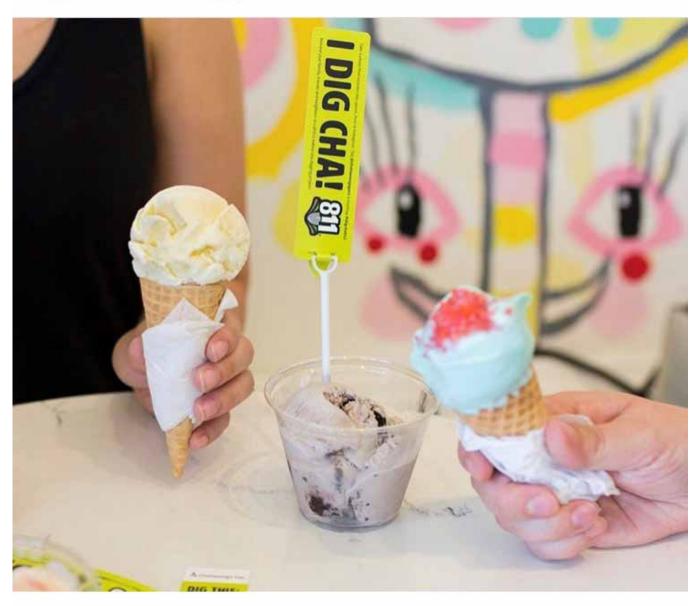
14 minutes ago



ahattanaaaaaa1



clumpies Chattanooga, Tennessee













Liked by alex_de_hart and 57 others

clumpies We're celebrating a safer digging community with @chattanoogagas1 this weekend! Be on the lookout for one of 811 miniature... more

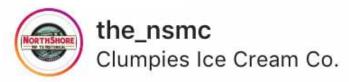
3 days ago



clumpies

Posts

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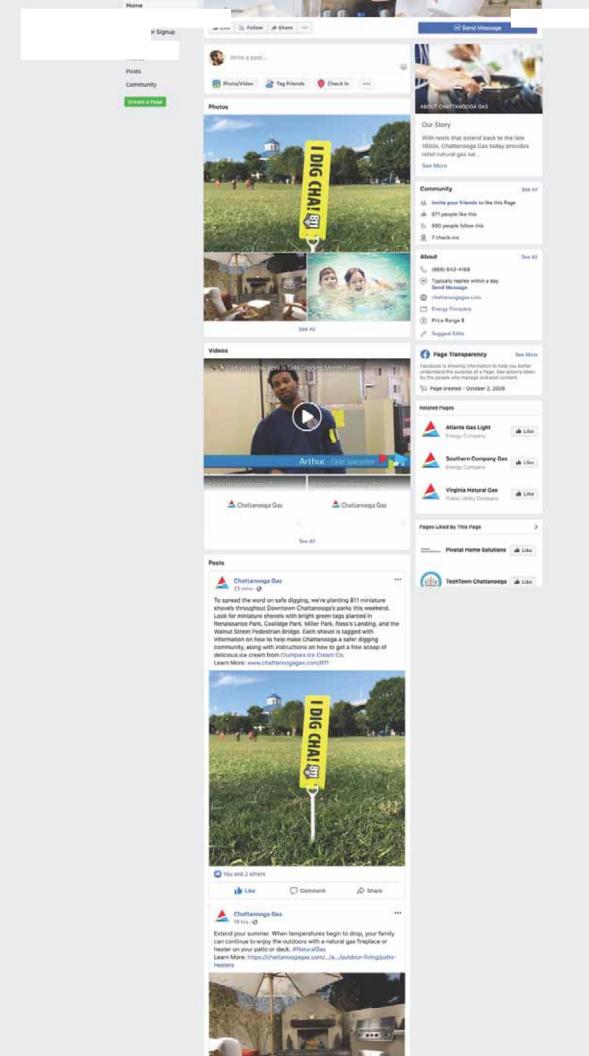






Liked by virninja.elizabeth and 19 others

the_nsmc @clumpies is celebrating a safer digging community with Chattanooga Gas this weekend! Be on the lookout for one of 811 miniature... more



Docket No. 20-00049 CGC Response CA-2-8 Attachment G Page 13 of 13