

STATE OF TENNESSEE

Office of the Attorney General



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February 24, 2021

Chairman Kenneth C. Hill  
c/o Ms. Tory Lawless, Docket Manager  
Tennessee Public Utility Commission  
502 Deaderick Street, 4<sup>th</sup> Floor  
Nashville, Tennessee 37242-0001

In Re: *Chattanooga Gas Company Petition for Approval of Its Pipe Replacement Program*, TPUC Docket No. 20-00131.

Dear Chairman Hill:

On December 2, 2020, the Chattanooga Gas Company (CGC) filed *Chattanooga Gas Company Petition for Approval of Its Pipe Replacement Program* (Petition) and testimony in support of this Petition. In this filing, CGC is seeking an "approval to replace certain identified vintage natural gas mains and service lines pursuant to a specific schedule along with the authority to request approval to recover the actual annual cost for such Pipe Replacement Program (PRP) expenditures through CGC's annual review mechanism."<sup>1</sup> CGC is not seeking to recover any expenditures in this docket but rather is requesting that it be allowed to utilize the ARM process.<sup>2</sup>

The Consumer Advocate Unit in the Financial Division of the Tennessee Attorney General's Office (Consumer Advocate) has reviewed the Petition and testimony filed within this docket. Following initial review, the Consumer Advocate sent informal questions to CGC, and CGC filed its responses on January 1, 2021. The Consumer Advocate has completed its review of these responses as well as the Petition and testimony supporting CGC's request to implement the proposed PRP and for CGC to seek to recover the actual annual cost for such PRP expenditures through CGC's annual review mechanism.

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<sup>1</sup> Petition at p. 1.

<sup>2</sup> Petition at p. 16, 29. In its Petition, CGC states it "is not seeking approval for any specific cost recovery/rate design in this docket. CGC recognizes that under the ARM Order, no specific rate design is specified. Rather, the ARM Order allows CGC, any parties, or the Commission to propose a rate design, with the Commission picking an appropriate rate design for the cost recovery methodology based upon the record presented in each individual ARM case." *Id.*

The Consumer Advocate respectfully expresses its intent not to intervene in this proceeding. The Consumer Advocate's opinion or expression of intent may not be used for any purpose other than the expression of intent not to intervene stated herein.

The Consumer Advocate requests that this letter be filed in this Docket.

Sincerely,

A handwritten signature in dark ink, reading "Karen H. Stachowski". The signature is written in a cursive, slightly slanted style.

Karen H. Stachowski  
Assistant Attorney General

cc: J.W. Luna, Esq.  
Floyd R. Self, Esq.  
Elizabeth Wade, Esq.  
Paul Teague, CGC