



October 26, 2021

Chairman Kenneth C. Hill
ATTN: Ectory Lawless, Docket Clerk
Tennessee Public Utility Commission
502 Deaderick Street, 4th Floor
Nashville, TN 37243

Re: Docket to Evaluate Chattanooga Gas Company's Purchases and Related Sharing Incentives; Docket No. 20-00139

Dear Chairman Hill:

Please find enclosed for filing in the above referenced docket Chattanooga Gas Company's Information Requests to Exeter. The attached Requests were provided to Exeter by the Hearing Officer in this docket on or about October 19 or 20, 2021. It is our understanding that Exeter will endeavor to provide written information a week prior to the deposition which is now scheduled for November 19, 2021.

Yours truly,

Butler Snow LLP

A handwritten signature in blue ink, appearing to read "J.W. Luna".

J.W. Luna

JWL/cb

Enclosures

cc: Monica Smith-Ashford, Hearing Officer
Karen Stachowski, Esq.
Vance Broemel, Esq.
Rachel Bowen, Esq.

T 615.651-6700
F 615.651.6701
www.butlersnow.com

Jones Wilson (J.W.) Luna
T 615-651-6749
jw.luna@butlersnow.com

150 3rd Ave. South
Suite 1600
Nashville, TN 37201

Data Request Questions to Exeter

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General Instructions: For each question, please identify the name, business title/position, and business address for each person responding. Please also provide an affidavit similar in form as is attached hereto for each person who provides a response indicating the question numbers responded to and attesting to the truthfulness of the information provided.

1. 24 of the Report identifies now terminated gas incentive mechanisms for Nicor Gas in Illinois and Vectren North, Vectren South, and Citizens Gas in Indiana. For each of these companies, please provide the following information:
 - a. When did the sharing incentive start and stop for each utility?
 - b. Describe the type of sharing mechanism (percentage split or other basis) for each utility.
 - c. Please explain why the sharing incentive was terminated.
2. For the Gas Cost Incentive Mechanism for Northern Indiana Public Service Company identified on Page 24 of the Report, please provide the following information:
 - a. Identify when the sharing incentive started.
 - b. Describe the type of sharing mechanism (percentage split or other basis) for the utility.
 - c. Please explain the basis for the current sharing incentive.
3. For each of the utilities in Delaware, Louisiana, Massachusetts, Ohio, and Pennsylvania that Exeter identified on Page 24 for which Exeter regularly performs various reviews, please provide the following information:
 - a. Identify each utility and the regulatory authority with oversight of that utility.
 - b. Identify for each utility when the sharing incentive started.
 - c. Describe the type of sharing mechanism (percentage split or other basis) for the utility.
 - d. Discuss the basis for the current sharing incentive.
4. In Sections 6.1.2 and 6.1.3, the Report discusses the incentive programs of Atmos and Piedmont, respectfully. Answer the following questions based upon the information relied upon and assumptions made at the time the Report was written:
 - a. Has Exeter ever audited the incentive mechanisms of Atmos and Piedmont? If so, please identify the dates for each final audit report, identify the dockets for which such audits were conducted, and, if such final report is not available on the TPUC website, provide an electronic copy (a non-confidential copy if the report includes confidential information) of each such reports prepared by Exeter.
 - b. If the incentive mechanism programs of Atmos and/or Piedmont have ever been audited or reported upon by Exeter, has Exeter ever proposed any changes to such programs? If so, please discuss each such change, including an identification of the change, the problem or issue proposed to be addressed by such changes, how the proposed changes would address such problems or issues, whether such changes were adopted in full or part, and a summary of any subsequent assessment or report as to whether such changes produced the results anticipated from such changes.

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- c. Why were Atmos and Piedmont chosen for comparison?
 - d. Why were none of the other utilities referenced by the Report on Page 24 with which Exeter has knowledge and experience utilized for discussion or comparison purposes?
 - e. Discuss how Atmos and Piedmont are similar to and different from CGC.
 - f. Discuss how the Atmos and Piedmont incentive mechanisms are similar to and different from the CGC incentive mechanisms.
 - g. Based upon the information known and considered at the time the Report was prepared, discuss why Exeter believes the Atmos and Piedmont incentive mechanism are relevant to an assessment of CGC's incentive mechanism and instructive to recommending changes to the CGC incentives.
5. Given the statements in the second paragraph of Section 6.2 of the Report regarding the sharing percentages used in other jurisdictions, for each jurisdiction Exeter looked at or knows about, provide the following information:
 - a. Identify each jurisdiction reviewed.
 - b. Identify each utility by jurisdiction that was reviewed.
 - c. Provide the sharing percentage for each utility that was reviewed.
6. In preparing the Report, did Exeter identify any other natural gas utility in the United States with a 50/50 sharing incentive sharing split for AMA fees, capacity release revenues, and off-system sales margins? If so, please identify such utilities by jurisdiction and explain why information regarding those utilities was not discussed or otherwise included in the Report.
7. The Report states at page 45, "Exeter has observed no material differences in the resource efforts of natural gas utilities to generate AMA fees, capacity release revenues, or off system sales margins under a 25% sharing incentive compared to a 10% sharing incentive nor has Exeter observed a natural gas utility failing to devote sufficient resources to maximize these revenues/margins when provided a sharing incentive." In connection with this statement, answer the following:
 - a. At the time of preparing the Report, did Exeter assess whether there any material difference in the resource efforts of natural gas utilities to generate AMA fees, capacity release revenues, or off system sales margins under a 50% sharing incentive compared to either a 25% or a 10% sharing incentive?
 - b. If Exeter conducted such an analysis, what was the results of such an analysis?
 - c. If Exeter conducted such an analysis, why was that information not provided in the Report?
8. Please identify and provide electronic copies of all documents relied upon in the preparation of Section 6.0 of the Report. Where documents are publicly available electronically on a website, you may provide links to such documents in lieu of producing document copies.

AFFIDAVIT

STATE OF _____)

COUNTY OF _____)

I hereby certify that on this _____ day of _____, 2021, before me, an officer duly authorized in the State and County aforesaid to take acknowledgments, personally appeared _____, who is personally known to me or who produced as identification a valid driver's license or other government issued identification, and he/she acknowledged before me that he/she provided the answers to Tennessee Public Utility Commission data request number(s) _____ to be used in Docket No. 20-00139, and that the responses are true and correct based on his/her personal knowledge.

In Witness Whereof, I have hereunto set my hand and seal in the State and County aforesaid as of this _____ day of _____, 2021.

Notary Public

State of _____, at Large

My Commission Expires:

[SEAL/STAMP]