

Chattanooga Gas Company
Docket No. 21-00048
2020 Annual Rate Review

Consumer Advocate's Second Set of Discovery Requests

CA-2-010 Define/Identify. Provide a list of all known errors in the Company's ARM Model.

CGC RESPONSE:

All known errors in the Company's ARM model have been provided by the Company in the following data request responses:

- I. In the Company's response to the Consumer Advocates Discovery Request CA 1-5 the Company provided revisions to Schedule 14 and 14.1
- II. In the Company's response to the Consumer Advocates Discovery Request CA 1-9 the Company provided revisions to Schedule 15 and 15.1
- III. In the Company's response to the Consumer Advocates Discovery Requests CA 2-4 the Company identified revisions to its protected and unprotected EDIT calculations.
- IV. In the Company's response to the Consumer Advocates Discovery Request CA 2-5 the Company identified revisions to the ADIT adjustment for pension and OPEB on Schedule 2A1.
- V. In the Company's response to the Consumer Advocates Discovery Request CA 2-6 the Company identified that an additional adjustment was needed and provided revisions with corrections to Schedule 35.10 Impacts of April 2020 Tornado Event
- VI. In the Company's response to the Consumer Advocates Discovery Request CA 2-12 the Company revised the classification of income tax expense which impacted the lead lag calculation.
- VII. In the Company's response to the Consumer Advocates Discovery Request CA 2-16 the Company provided revisions with corrections to the Company's response to CA 1-9.

- VIII. In the Company's response to Consumer Advocates Discovery Request CA-2-18 the Company provided revisions to the Incentive Compensation Adjustments on Schedule 27.
- IX. In the Company's response to Consumer Advocates Discovery Request CA-2-20, the Company removed certain legal cost from the Company's cost of service.
- X. In the Company's response to Consumer Advocates Discovery Request CA-2-23, the Company removed certain allocated costs from the Company's cost of service.

All revision will be detailed in the rebuttal testimony and supporting exhibits of Mr. Tucker and Mr. Hickerson.

CGC FURTHER RESPONSE 6-16-2021:

See CA-2-010a Attachment (6-16-2021) for a copy of Exhibit GT-1 (ARM Model) (Revised 6-16-2021) containing the corrections noted in parts I through X above. Please note, Schedule 1 of the attachment now also provides the impacts to the deficiency, rate reset and overall rate adjustment resulting from the corrections.

The overall change in the rate adjustment is a decrease of \$86,744, which does not materially impact the proposed cap. Due to the small overall change in the rate adjustment, a revised Exhibit GT-3 will not be provided.

Witness: Archie Hickerson
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Southern Company Gas

Gary Tucker
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Southern Company Gas