

IN THE TENNESSEE PUBLIC UTILITY COMMISSION
AT NASHVILLE, TENNESSEE

IN RE:)
)
JOINT REQUEST OF CHATTANOOGA)
GAS COMPANY AND KORDSA, INC.) DOCKET NO. 21-00094
FOR APPROVAL OF SPECIAL)
CONTRACT)
)

CONSUMER ADVOCATE'S SECOND DISCOVERY REQUEST
TO CHATTANOOGA GAS COMPANY

This Second Discovery Request is hereby delivered upon Chattanooga Gas Company (CGC) pursuant to Rules 26, 33, 34 and 36 of the Tennessee Rules of Civil Procedure and Tenn. Comp. R. & Reg. 1220-1-2-.11. The Consumer Advocate Unit in the Financial Division of the Office of the Attorney General ("Consumer Advocate") requests full and complete responses be provided pursuant to the Tennessee Rules of Civil Procedure.

PRELIMINARY MATTERS AND DEFINITIONS

These additional discovery requests incorporate by reference the same Preliminary Matters and Definitions as set forth in the *Consumer Advocate's First Informal Discovery Request to CGC* sent to the Company on October 12, 2021 and are to be considered continuing in nature and are to be supplemented from time to time as information is received by the Company which would make a prior response inaccurate, incomplete, or incorrect.

SECOND DISCOVERY REQUESTS

2-1. Refer to the spreadsheet attachment provided with CGC's response to Consumer Advocate's Informal DR 1-5 regarding the pro forma calculation of monthly revenues from Kordsa. The formulas in the spreadsheet attachment appear to have been converted to

hard-coded values making it impossible to follow the Company's audit trail calculation. For example, Cell T4 of the "Revenue Detail" tab in the spreadsheet attachment shows \$13,055 as a hard-coded value without any formula for how this amount was calculated.

Please provide a copy of this same spreadsheet attachment with all formulas intact.

RESPONSE:

- 2-2. Refer to CGC's response to Consumer Advocate's Informal DR 1-9 regarding "additional services" between the parties under the proposed contract. CGC's response to this discovery request indicates that it "anticipates increased usage of natural gas by Kordsa." Provide all communication related to this increased usage including the anticipated volumes and expected monthly deliveries.

RESPONSE:

- 2-3. Refer to CGC's response to Consumer Advocate's Informal DR 1-10 regarding CGC's analysis and workpapers related to Kordsa's cost to bypass. CGC's reply to this request appears to be non-responsive since no workpapers or analysis was provided. Therefore, please provide a copy of CGC's analysis and workpapers of Kordsa's cost to bypass, including any communication with CGC's affiliates with experience in constructing such facilities, whether or not this review was fully completed.

RESPONSE:

- 2-4. Refer to CGC's response to Consumer Advocate's Informal DR 1-11 regarding CGC's chronological order of events on this case. Specifically refer to the May 13, 2021 event which states that "CGC sent Kordsa email of additional info needed for supporting info." Please provide a copy of all email from CGC to Kordsa requesting additional information.

RESPONSE:

- 2-5. Refer to CGC's response to Consumer Advocate's Informal DR 1-11 regarding CGC's chronological order of events on this case. Specifically refer to the May 19, 2021 event which states that "Kordsa met CGC and provided additional supporting documentation; Kordsa mentioned the possibility of an acceptable rate in between their old rate and tariff rate." Please provide the following information related to this event:
- a. Identify all individuals physically or electronically present at this meeting.
 - b. Provide a copy of all information provided to CGC from this meeting.

RESPONSE:

RESPECTFULLY SUBMITTED,



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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served via U.S. Mail,
with a courtesy copy by electronic mail upon:

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This the 27th day of October, 2021.



RACHEL C. BOWEN
Assistant Attorney General