

**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 THIRD DISCOVERY REQUEST TO KORDSA, INC.

This Third Discovery Request is hereby delivered upon Kordsa, Inc. (“Kordsa”) 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

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

THIRD DISCOVERY REQUEST

3-1. Refer to the Company's response to Item 2-5 of the Consumer Advocate's second data request regarding communication with East Tennessee Natural Gas Pipeline and its affiliates. The Company's reply states, in part, that "Kordsa is not aware of any other substantive communications between the two companies relevant to this project."

However, the request also asked for all communication between Kordsa's agents (specifically Tennessee Energy Consultants/Earl Burton and Rod Walker & Associates/Rod Walker) and East Tennessee Natural Gas Pipeline and its affiliates. Therefore, provide all communication between all of Kordsa's agents, including Tennessee Energy Consultants/Earl Burton and Rod Walker & Associates/Rod Walker, with East Tennessee Natural Gas Pipeline and its affiliates regarding Kordsa's plant in Chattanooga.

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:

Henry Walker, Esq.
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This the 2nd day of November, 2021.



RACHEL C. BOWEN
Assistant Attorney General