

Henry Walker
hwalker@bradley.com
615.252.2363 direct
615.252.6363 fax



November 19, 2021

VIA ELECTRONIC FILING & U.S. MAIL

Electronically Filed in TPUC Docket Room
on November 19, 2021 at 2:45 p.m.

Chairman Kenneth C. Hill
Tennessee Public Utility Commission
c/o Tory Lawless
502 Deaderick Street, Fourth Floor
Nashville, Tennessee 37243

Re: Docket No. 21-00094
Joint Request of Chattanooga Gas Company and Kordsa, Inc. for Approval of
Special Contract

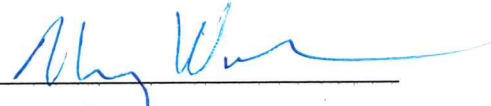
Dear Chairman Hill:

On behalf of Kordsa, Inc., please accept the attached affidavit in support of Kordsa's "Motion to Grant Interim Approval of Special Contract, Subject to Hearing and True-up" filed November 17, 2021.

Please call me at 615.252.2363 if you have any questions.

Sincerely,

BRADLEY ARANT BOULT CUMMINGS, LLP

By: 
Henry Walker

HW/mf
Enclosures

**Affidavit of Ben Gibson.pdf**

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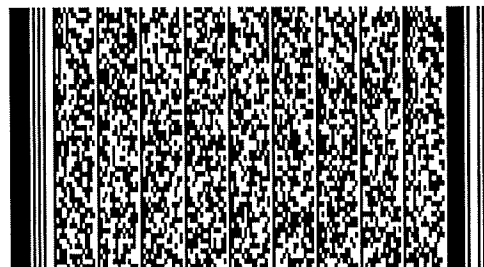
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E-Signature Summary**E-Signature 1: Benjamin Mark Gibson (BMG)**

November 19, 2021 13:35:59 -6:00 [753C1AA65755] [216.62.161.194]
Ben.Gibson@kordsa.com (Principal)

E-Signature Notary: Stephanie Covington (sgc)

November 19, 2021 13:35:59 -6:00 [051D323D250E] [12.202.200.171]
sgcovington@bradley.com
I, Stephanie Covington, did witness the participants named above electronically sign this document.



Affidavit of Ben Gibson

My name is Ben Gibson. I am the North American Supply Chain Manager for Kordsa, Inc. and report directly to Kadir Toplu, the Chief Operating Officer for Kordsa's operations in North and South America. I have filed testimony in Docket 21-00094 concerning Kordsa's plans to build and operate a natural gas line connecting Kordsa's Chattanooga plant to the nearby East Tennessee Natural Gas Pipeline, bypassing the facilities of Chattanooga Gas. As stated in my testimony, Kordsa has obtained the necessary easements to build the bypass line, confirmed the availability of a tap from East Tennessee Natural Gas, hired a contractor to build the line and obtained management approval to start the project. We were ready to begin building the line in June, 2021 when Chattanooga Gas contacted Kordsa requesting that we enter into a Special Contract at a discounted rate rather than bypass CGC. Kordsa agreed to pause our plans and negotiated a Special Contract with CGC. Today, however, Kordsa is still paying CGC's tariffed rates.

The purpose of this affidavit is twofold. First, I want to make clear that Mr. Toplu has approved building the bypass line and that no approval from Kordsa's corporate board in Turkey is required for this project.

The second purpose of this affidavit is to state that if Kordsa cannot begin receiving the benefit of the Special Contract rates, Kordsa is prepared to go ahead and build the bypass line. The line can be completed in six months. After it is built, Kordsa and any future manufacturing facility that occupies this site will no longer be customers of Chattanooga Gas. To avoid that result, Kordsa asks that the Commission grant interim approval of the Special Contract subject to a hearing and a true-up if necessary.



Further, Affiant Sayeth Not.

Benjamin Mark Gibson
Signed on 2021/11/19 13:35:59 -6:00

Ben Gibson

State of Tennessee

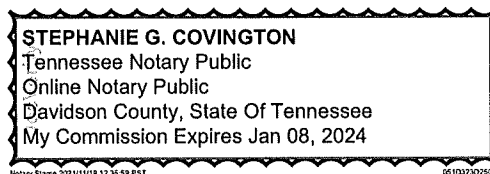
County of Davidson

Personally appeared before me, Ben Gibson, the within named Affiant, with whom I am personally acquainted (or proved to me on the basis of satisfactory evidence), and who acknowledged that he executed the within instrument for the purposes therein contained.

Witness my hand, at office, this 19th day of November, 2021.

Notary's Signature
Signed on 2021/11/19 13:35:59 -6:00

Notary's Signature
My commission expires: 1/8/24
(SEAL)



Notarial act performed by audio-visual communication



CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served via either U.S. Mail, postage prepaid, or email to the following this 19th day of November, 2021:


Rachel C. Bowen
Office of the Tennessee Attorney General
500 Dr. Martin L. King Jr. Blvd.
Nashville, Tennessee 37243

Consumer Advocate Unit

Floyd R. Self, Esq. (Fla. Bar No. 608025)
Berger Singerman, LLP
313 North Monroe St. Ste. 301
Tallahassee, FL 32301
(850) 561-3010
fself@bergersingerman.com

J.W. Luna, Esq. (B.P.R. No. 5780)
Butler Snow
The Pinnacle at Symphony Place
150 3rd Avenue South, Suite 1600
Nashville, TN 37201
jw.luna@butlersnow.com

Attorneys for Chattanooga Gas Company



Henry Walker