

STATE OF TENNESSEE

Office of the Attorney General



HERBERT H. SLATERY III
ATTORNEY GENERAL AND REPORTER

P.O. BOX 20207, NASHVILLE, TN 37202
TELEPHONE (615)741-3491
FACSIMILE (615)741-2009

May 20, 2022

Kelly Cashman-Grams
General Counsel
c/o Tory Lawless
Docket Manager
Tennessee Public Utility Commission
502 Deaderick Street
Nashville, TN 37243

Electronically Filed in TPUC Docket
Room on May 20, 2022 at 2:51 p.m.

Re: Records Request Related to Piedmont Natural Gas Company, Inc., Chattanooga Gas Company, and Atmos Energy Corporation (Docket Nos. 21-00099, 21-000100, and 21-00101)

Dear Ms. Cashman-Grams:

Pursuant to Tenn. Code Ann. § 65-4-118(b)(2), the Consumer Advocate Unit in the Financial Division of the Tennessee Attorney General's Office ("Consumer Advocate") respectfully requests the Tennessee Public Utility Commission ("TPUC") to furnish some specific records which the Consumer Advocate believes TPUC may possess that are needed for the Consumer Advocate's analysis in the above-referenced Dockets. The records requested are as follows:

1. Please provide Piedmont Natural Gas Company's "Actual Cost Adjustment Account balance" filed with the Commission for the first quarter of 2022. Specifically, the Consumer Advocate is requesting the quarterly report referenced in the Commission's *Order Adopting ACA Audit Report of Tennessee Public Utility Commission's Utilities Division*.¹ In this *Order*, the Commission directed Piedmont Natural Gas Company, Inc. to "informally file, on a quarterly basis, its Actual Cost Adjustment Account balances with the Tennessee Public Utility Commission Staff."²

¹ *Order Adopting ACA Audit Report of Tennessee Public Utility Commission's Utilities Division*, TPUC Docket No. 20-00107 (May 6, 2021).

² *Id.* at p. 2, Item 2.

2. Please provide Chattanooga Gas Company's "Actual Cost Adjustment Account balance" filed with the Commission for the first quarter of 2022. Specifically, the Consumer Advocate is requesting the quarterly report referenced in the Commission's *Order Adopting ACA Audit Report of Tennessee Public Utility Commission's Utilities Division*.³ In this *Order*, the Commission directed Chattanooga Gas Company to "informally file, on a quarterly basis, its Actual Cost Adjustment Account balances with the Tennessee Public Utility Commission Staff."⁴
3. Please provide Atmos Energy Corporation's "Actual Cost Adjustment Account balance" filed with the Commission for the first quarter of 2022. Specifically, the Consumer Advocate is requesting a copy of the quarterly reporting referenced in the Commission's *Order Adopting ACA Audit Report of Tennessee Public Utility Commission's Utilities Division*.⁵ In this *Order*, the Commission directed Atmos Energy Corporation to "informally file, on a quarterly basis, its Actual Cost Adjustment Account balances with the Tennessee Public Utility Commission Staff."⁶

The Consumer Advocate has been granted intervention in TPUC Docket No. 21-00101. However, if the requested documents are identified as Confidential in TPUC Docket Nos. 21-00099 or 21-00100, please let us know and we will seek to intervene in the two dockets.

Thank you for your time and consideration of this matter. If you have questions regarding this request, please contact me at (615)741-2370.

Sincerely,



Karen H. Stachowski
Senior Assistant Attorney General

cc: James Jeffries IV
Paul S. Davidson
J.W. Luna
Floyd R. Self
Erik Lybeck

³ *Order Adopting ACA Audit Report of Tennessee Public Utility Commission's Utilities Division*, TPUC Docket No. 19-00077 (September 28, 2020).

⁴ *Id.* at p. 2, Item 2.

⁵ *Order Adopting ACA Audit Report of Tennessee Public Utility Commission's Utilities Division*, TPUC Docket No. 20-00105 (August 20, 2021).

⁶ *Id.* at p. 2, Item 2.