

**IN THE TENNESSEE PUBLIC UTILITY COMMISSION
AT NASHVILLE, TENNESSEE**

IN RE:)	
)	
CHATTANOOGA GAS COMPANY PETITION FOR APPROVAL OF TARIFF AMENDMENTS TO ITS T-1, T-2, AND T-3 TARIFFS)))))))	DOCKET NO. 22-00004

**CONSUMER ADVOCATE’S FIRST DISCOVERY REQUEST
TO CHATTANOOGA GAS COMPANY**

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This First Discovery Request is hereby served upon Chattanooga Gas Company (“CGC” or the “Company”), pursuant to Rules 26, 33, 34, and 36 of the Tennessee Rules of Civil Procedure and Tenn. Comp. R. & Reg. 1220-01-02-.11. The Consumer Advocate Unit in the Financial Division of the Office of the Attorney General (“Consumer Advocate”) requests that full and

complete responses be provided pursuant to the Tennessee Rules of Civil Procedure. The responses are to be produced at the Office of the Tennessee Attorney General and Reporter, Financial Division, Consumer Advocate Unit, John Sevier Building, 500 Dr. Martin L. King Jr. Blvd., Nashville, Tennessee 37243, c/o Karen H. Stachowski on or before April 29, 2022, at 2:00 p.m. CDT.

PRELIMINARY MATTERS AND DEFINITIONS

1. **Continuing Request.** These discovery requests are to be considered continuing in nature and are to be supplemented from time to time as information is received by the Company and any of its affiliates which would make a prior response inaccurate, incomplete, or incorrect.

2. **Clear References.** To the extent that the data or information requested is incorporated or contained in a document, identify the document including page/line number if applicable.

3. **Format of Responses.** Provide all responses in the format in which they were created or maintained, for example, Microsoft Word or Microsoft Excel format with all cells and formulas intact and in working order. If a document (including without limitation a financial or other spreadsheet or work paper) is not created or maintained in Microsoft Excel format, convert the document to Microsoft Excel format or provide the document in a format that enables or permits functionality like or similar to Microsoft Excel (including without limitation the functionality of working cells and formulas), or provide the software program(s) that will enable the Consumer Advocate to audit and analyze the data and information in the same manner as would be enabled or permitted if the document were provided in Microsoft Excel format.

4. **Objections.** If any objections to this discovery are raised on the basis of privilege or immunity, include in your response a complete explanation concerning the privilege or

immunity asserted. If you claim a document is privileged, identify the document, and state the basis for the privilege or immunity asserted. If you contend that you are entitled to refuse to fully answer any of this discovery, state the exact legal basis for each such refusal.

5. **Singular/Plural.** The singular shall include the plural, and vice-versa, where appropriate.

6. **Definitions.** As used in this Request:

(a) “You,” “Your,” “Company,” “Chattanooga Gas,” or “CGC” shall mean Chattanooga Gas Company and all employees, agents, attorneys, representatives, or any other person acting or purporting to act on its behalf.

(b) “Affiliate” shall mean any entity who, directly or indirectly, is in control of, is controlled by, or is under common control with the Company. For greater clarification, “control” is the ownership of 20% or more of the shares of stock entitled to vote for the election of directors in the case of a corporation, or 20% or more of the equity interest in the case of any other type of entity, or status as a director or officer of a corporation or limited liability company, or status as a partner of a partnership, or status as an owner of a sole proprietorship, or any other arrangement whereby a person has the power to choose, direct, or manage the board of directors or equivalent governing body, officers, managers, employees, proxies, or agents of another person. In addition, the term “Affiliate” shall mean any entity that directly or indirectly provides management or operational services to the Company or any affiliate (as defined in the preceding sentence) of the Company, or to which the Company provides management or operational services. Further, the payment of money to the Company or receipt by the Company of money from an entity with which the Company has any relationship, other than such payment or receipt, shall include the payor or recipient of such money as an “Affiliate”.

(c) “Communication” shall mean any transmission of information by oral, graphic, written, pictorial or otherwise perceptible means, including but not limited to personal conversations, telephone conversations, letters, memoranda, telegrams, electronic mail, newsletters, recorded or handwritten messages, meetings, and personal conversations, or otherwise.

(d) “Document” shall have the broadest possible meaning under applicable law. “Document” shall mean any medium upon which intelligence or information can be recorded or retrieved, such as any written, printed, typed, drawn, filmed, taped,

or recorded medium in any manner, however produced or reproduced, including but not limited to any writing, drawing, graph, chart, form, letter, note, report, electronic mail, memorandum (including memoranda, electronic mail, report, or note of a meeting or communication), work paper, spreadsheet, photograph, videotape, audio tape, computer disk or record, or any other data compilation in any form without limitation, which is in your possession, custody or control. If any such document was, but no longer is, in your possession, custody or control, state what disposition was made of the document and when it was made?

(e) “Person” shall mean any natural person, corporation, firm, company, proprietorship, partnership, business, unincorporated association, or other business or legal entity of any sort whatsoever.

(f) “Identify” with respect to:

- i. Any natural person, means to state the full name, telephone number, email address and the current or last known business address of the person (if no business address or email address is available provide any address known to you) and that person’s relationship, whether business, commercial, professional, or personal with you;
- ii. Any legal person, business entity or association, means to state the full name, the name of your contact person with the entity, all trade name(s), doing business as name(s), telephone number(s), email address(es), and current or last known business address of such person or entity (if no business address is available provide any address known to you);
- iii. Any document, means to state the type of document (e.g., letter), the title, identify the author, the subject matter, the date the document bears and the date it was written; and
- iv. Any oral communication, means to state the date when and the place where it was made, identify the person who made it, identify the person or persons who were present or who heard it, and the substance of it.

(g) “And” and “or” shall be construed conjunctively or disjunctively as necessary to make the discovery request inclusive rather than exclusive.

(h) “Including” shall be construed to mean including but not limited to.

FIRST SET OF DISCOVERY REQUESTS

1-1. What is the implication of operational flow orders on the needs of CGC to daily balance?

RESPONSE:

1-2. Identify the marketers acting on behalf of CGC's end-use transportation customers. If known by CGC, provide a listing of its transport customers associated with each marketer.

Further identify the 2021 throughput managed by each of these marketers.

RESPONSE:

1-3. Identify the number of Operational Flow Orders ("OFO") by interstate pipeline by year for each of the past five years.

RESPONSE:

1-4. Identify the marketers acting on behalf of CGC transport customers that are not nominating gas deliveries on a daily basis.

RESPONSE:

1-5. Identify the marketers acting on behalf of CGC transport customers that are materially under or over scheduling their volumes.

RESPONSE:

1-6. Confirm that scheduling occurs between the end-use customer (or marketer acting on the customer's behalf) and the applicable interstate pipeline. If this is not confirmed, please discuss the entity receiving and acting upon the scheduling order.

RESPONSE:

- 1-7.** Define “Balancing Order” as is used in Mr. Hickerson’s testimony on page 9, lines 4 and 5.

RESPONSE:

- 1-8.** Provide a comprehensive discussion of the relationship between the interstate pipeline issuing an OFO and the Company issuing a “daily balancing order” as the terms are used on page 9, lines 4 and 5 of Mr. Hickerson’s Direct Testimony. Are there instances where the Company may issue a daily balancing order in the absence of an OFO issued by a pipeline company? If so, describe those instances.

RESPONSE:

- 1-9.** How is “daily index” price defined as is used in the proposed T-1 tariff?

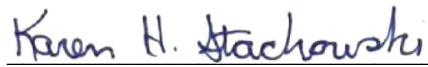
RESPONSE:

- 1-10.** Discuss the economic and operational challenges to CGC if a customer’s transport deliveries made into the CGC system are in excess of the customer’s daily consumption, which support the proposed tariff changes for over-deliveries.

RESPONSE:

- 1-11.** Provide a copy of the language within applicable interstate pipeline company tariffs that directly or indirectly support the need for CGC’s tariff revisions. This request is limited to those interstate pipeline companies with which CGC conducts business. A hyperlink with a reference to the area of the tariff containing the applicable tariff provisions may be provided in place of the text.

RESPECTFULLY SUBMITTED,



KAREN H. STACHOWSKI (BPR No. 019607)

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TPUC Docket No. 22-00004

Consumer Advocate's First Discovery Request

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 8th day of April, 2022.



KAREN H. STACHOWSKI
Senior Assistant Attorney General