

**BEFORE THE TENNESSEE PUBLIC UTILITY COMMISSION
NASHVILLE, TENNESSEE**

May 4, 2022

Chattanooga Gas Company)	
Petition for Approval of Tariff)	Docket No. 22-00004
Amendments to T-1, T-2, and T-3)	

**CHATTANOOGA GAS COMPANY'S
SUPPLEMENTAL RESPONSE AND OBJECTIONS TO CRMA'S
FIRST DISCOVERY REQUESTS, NO. 1-20**

Chattanooga Gas Company ("CGC" or "Company") files this Supplemental Response and Objection to the Chattanooga Regional Manufacturers Association ("CRMA").

First Round Discovery Requests, No. 1-20. In making this Supplemental Response, CGC hereby incorporates its General Objections to CRMA's First Set of Discovery Requests, served by CGC on April 29, 2022, and filed with the Tennessee Public Utility Commission on May 2, 2022.

1-20 Provide copies of all emails of Company personnel that address flow orders (either upstream pipeline or system balancing/curtailment orders) for November 1, 2020 through March 31, 2021. For emails, identify the job function of the Company employee.

CGC RESPONSE (April 29, 2022):

CGC objects to this request as it is overly broad, unduly burdensome, oppressive, and excessively time consuming. This request is asking CGC to review all of the emails for its Gas Supply and Gas Control group to identify flow orders and to segregate out only those involving CGC, when often those emails will involve multiple Southern Company Gas LDCs and may involve otherwise information that is not relevant to this request. Subject

to and without waiving the foregoing objections, CGC states as follows: CGC is in the process of compiling responsive emails and reviewing them to redact non-CGC information. CGC hopes to have responsive information for this request as soon as possible, in the next week.

CGC SUPPLEMENTAL RESPONSE (May 4, 2022):

Subject to and without waiting its specific objection to this request, CGC provides the following further response to this request:

After a reasonable and diligent service CGC will provide those emails that CGC has been able to locate and identify containing information responsive to this request. Those emails are gathered and provided in CONFIDENTIAL Exhibit CRMA 1-20. Because of the size of this document, CGC is unable to email it. However, it is now available on the sharesite containing the other CGC confidential documents, and parties and the Commission Staff who have been provided that confidential link pursuant to the Protective Order in this docket may download this document.

Please be advised that this document is confidential. Please further note that there is information that has been redacted from this confidential document. The information redacted is information about other Southern Company Gas local distribution gas utilities and therefore not relevant or responsive to this request.

The identity and job functions of the Company employees in the emails are listed below.

<u>Company Employees</u>	<u>Job Function</u>
Ardeschna, Arjun	Gas Controller
Cannon, Barry E	Gas Controller
Herrera, Nicolas	Gas Controller
Homer, Dallas Conrad	Gas Controller
Johnston, Jeremy	Gas Controller
Kenon, Chuck	Supervisor, Gas Control
Lockwood, Arlander	Gas Controller
Tomlinson, Matthew A.	Gas Controller
Watson, Larry J.	Gas Controller
Rosales, Raymundo	Supervisor, Gas Control
Jones, Marshall W.	Gas Controller
Borders, Richard C.	Gas Controller
Barr, Claire Monet	Data Science Analyst
Figueiredo, Miguel	Manager, Gas Supply
Chris Bellinger	Manager, Gas Supply

RESPECTFULLY SUBMITTED this 4th day of May, 2022,



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CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing **Responses and Objections to the CRMA's Discovery Requests, No. 1-20** were forwarded via electronic mail on May 4, 2022, to the following:

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