

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

IN RE:

**CHATTANOOGA GAS
COMPANY'S PETITION FOR
APPROVAL OF TARIFF
AMENDMENTS TO ITS
T-1, T-2, AND T-3 TARIFF**

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Docket No. 22-0004

**SECOND ROUND OF DISCOVERY REQUESTS OF
THE CHATTANOOGA REGIONAL MANUFACTURERS ASSOCIATION**

The Chattanooga Regional Manufacturers Association ("CRMA"), having been granted intervention in the above-captioned proceeding, submits the following discovery requests to Chattanooga Gas Company ("CGC").

DEFINITIONS AND INSTRUCTIONS

The "Definitions" and "Instructions" are the same as described in the "First Round of Discovery Requests" filed CRMA in this docket.

SECOND ROUND OF DISCOVERY REQUESTS

1. Regarding the response to Set I-1, "Define "Industrial Metered." Are there any customers of Chattanooga Gas that do not have a meter? Do the Industrial metered volumes reflect interruptible sales volumes?

RESPONSE:

2. Please confirm that the peak day during the winter season of the February Extreme Weather Event of 2021 was February 16, 2021 and that the peak system throughput was the sum of firm sales, industrial metered volumes, and nominated gas, totally 126,995. If not, please explain and provide correct data. If yes, does that represent pipeline capacity the Company is required to plan for?

RESPONSE:

3. Regarding the response to Set I-5, is the LNG deliverability on a peak day 90,400 Dth? If not, please explain.

RESPONSE:

4. Regarding data provided in Set I-3, does the capacity the Company holds to satisfy the peak sum of ETNG 89,350 Dth/Day + SNG 27,567 + LNG 90,400 = 207,317 Dth/day. If not, please explain and provide correct data.

RESPONSE:

5. As a follow up to Set I-31 (attachment A), explain the source of cost (column E), explain the allocation percentages in column G. Explain why off system sales ceased in September 2018. Explain what portion of the sales revenue or other fees retained by asset manager.

RESPONSE:

6. Please provide all documentation in the Company's possession (including its affiliates) discussing the viability of marketing LNG output off-system.

RESPONSE:

7. Confirm that the T-2/3 customers currently are allocated costs of firm capacity and explain the allocation mechanism.

RESPONSE:

8. Regarding the Asset Manager, provide historic annual payments for 2011-2021, including any portion of sales revenues retained, to the Asset Manager. Identify components of the annual payment and how they were determined.

RESPONSE:

9. Follow up on Set I-17, please add data to include the total number of customers and throughput data for each of the three classifications at the beginning and end of each annual period.

RESPONSE:

10. Follow up on Set I-19, during the 2019-2021 calendar years, if the T-1 and I-1 customers daily deliveries were added to the Company's daily deliveries, is that less than the amount of capacity the Company has?

RESPONSE:

11. Please provide a 12-month (May 1, 2021 – April 30, 2022) history of PGA costs for the F-1 and C-2 rate classes.

RESPONSE:

12. Please provide a 12-month (May 1, 2021 – April 30, 2022) history total sales/thru-put volumes the following rate classes, F-1, T-2, C-2 and T-3.

RESPONSE:

13. Please provide details on the process that CGC uses to confirm monthly natural gas "purchase volumes" each month with the Asset Manager. "Purchase Volumes" mean gas volumes to be purchases of first-of-month indexes, gas to be injected/withdrawn from storage and daily gas volumes.

RESPONSE:

14. For the winter months of November - March 2021, and November - March 2022, provide a daily itemized list of the following:
- a) CGC total metered volume for each day;
 - b) Deliveries by pipeline for each day; and
 - c) For each delivery, please provide whether or not this gas was purchased at monthly index, storage withdrawal, or gas daily.

RESPONSE:

15. For the winter months of November - March 2021, and November - March 2022, when there was a balancing order issued by CGC, and the full firm transportation pipeline entitlements were not fully utilized by CGC firm sales customers, please provide an explanation of why CGC did not offer incremental gas to CGC T-1 customers.

RESPONSE:

16. For the winter months of November - March 2021, and November - March 2022, when there was a balancing order issued by CGC, and CGC's LNG plant was utilized by CGC, please provide an explanation on why CGC did not offer incremental gas to CGC T-1 customers.

RESPONSE:

17. For the winter months of November - March 2021, and November - March 2022, when there was a balancing order issued by CGC, and CGC's LNG plant was utilized for peaking, were there any days when the manager of the LNG plant did not nominate the full firm transportation entitlements of CGC? Please provide explanation for the manager's decision.

RESPONSE:

18. For the winter months of November - March 2021, and November - March 2022, when there was a balancing order issued by CGC, and the LNG plant was utilized for peaking, provide a proforma model on the end of winter LNG inventory if CGC had provided incremental sales to T-1 customers each day that the LNG was operational.

RESPONSE:

19. Regarding the recent Exeter Report, please provide any provisions that CGC has made in the current AMA agreement that would allow for CGC to make off system sales using the LNG plant for displacement. Please provide an explanation on whether or not this type of transaction would take precedence over offering incremental sales to CGC T-1 customers.

RESPONSE:

20. Please provide a spreadsheet showing how much LNG gas was sold off system each month from November 1, 2017 to current.

RESPONSE:

21. Describe the methodology the Company uses to forecast annual consumption and peak day.

RESPONSE:

22. Provide the forecasting spreadsheet in excel format.

RESPONSE:

23. Provide the forecast of annual volume and peak day for the period 2022 through 2032.

RESPONSE:

24. Provide the historic forecast of annual consumption and peak day submitted in prior years for the year immediately following the specific filing. Please provide data for the period 2011 through 2021.

RESPONSE:

25. Provide the actual annual consumption and peak day for the period 2011 through 2021.


RESPONSE:

26. Provide customer count data, historic and projected and by customer class from 2011 to 2032.

RESPONSE:

Respectfully Submitted,

By: _____


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CERTIFICATE OF SERVICE

I hereby certify that I have on this 23th day of May, 2022, a copy of the foregoing document was served on the parties of record, via electronic email transmission and regular U.S. Mail, postage prepaid, addressed as follows:

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