

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

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
SECOND DISCOVERY REQUESTS, NOS. 2-10, 2-24, AND 2-25**

Chattanooga Gas Company ("CGC" or "Company") files this Supplemental Response and Objection to the Chattanooga Regional Manufacturers Association ("CRMA") Second Round Discovery Requests, Nos. 2-10, 2-24, and 2-25. In making this Supplemental Response, CGC hereby incorporates its General Objections to CRMA's Second Set of Discovery Requests, served by CGC on June 14, 2022, and filed with the Tennessee Public Utility Commission on June 15, 2022.

2-10. 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?

CGC RESPONSE (June 14, 2022):

Subject to any objections it may offer, CGC is continuing to assess whether and to what extent it may be able to compile some or all of this information in a timely manner.

CGC SUPPLEMENT RESPONSE (June 16, 2022):

CGC objects to this request as overly broad and unduly burdensome as it is vague and confusing. It is not clear if the request is for CGC to add the daily deliveries of the T-1 and I-1 customers to the Company's daily deliveries for each day of calendar years 2019, 2020, and 2021 or if the request is for CGC to add the T-1 and I-1 deliveries to the Company's daily deliveries for the peak days for calendar years 2019, 2020, and 2021. Since Rate Schedule I-1 customers do not transport their own gas, but purchase gas from CGC, it isn't clear what is being requested relative to I-1 customers daily deliveries. Subject to and without waiving the foregoing objections, CGC states as follows: the total throughput (Company System Supply plus Transportation Customers Supply) on the peak days in

calendar year 2019, 2020, and 2021 was less than the Company interstate pipeline capacity and the peaking supply from the LNG facility.

2-24. 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.

CGC RESPONSE (June 14, 2022):

CGC objects to this request as overly broad and unduly burdensome, seeking privileged and/or confidential information, and not reasonably calculated to lead to the discovery of admissible evidence. The purpose of this docket is to establish a penalty for those T-1, T-2, and T-3 customers who fail to nominate gas deliveries on a daily basis or who may materially under- or over-schedule and not maintain daily balances, and by whose actions, inappropriately shift costs from the transportation customers to the sales customers. This docket is not about CGC's gas forecasts, but the actions certain customers take to the detriment of other customers. Subject to and without waiving the foregoing objections, CGC states as follows: See CRMA DR 2-24 CONFIDENTIAL Attachment. Please note that the Annual Total and Peak Day load represents all load from all customer classes.

CGC SUPPLEMENTAL RESPONSE (June 16, 2022):

Please note that the information previously provided in CGC's response to CRMA DR 2-24 was actually responsive to CRMA DR 2-25. In making this correction, you should return to CGC or otherwise destroy the CRMA DR 2-24 CONFIDENTIAL Attachment provided on June 14, 2022; since this is the historic information, this is not confidential and is being provided in the substantive response to CRMA DR 2-25 below. This corrected information is also noted below in CGC's Supplemental Response to CRMA DR 2-25.

Substantively, with respect to the correct response to DR 2-24, CGC states:

CGC objects to this request as overly broad and unduly burdensome as it is vague and confusing. While CGC is asked to provide the historic forecasts of annual consumption and peak day submitted in the prior year for the year immediately following the specific filing, it is not explained to whom the forecast was to have been submitted or what is meant by "specific filing." The request is for "historic consumption" but doesn't explain if the forecasts consumption is for CGC sales customers, or if the request is for the forecasts of all customers' (sales and transportation customers) consumption. Subject to and without waiving the foregoing objections, CGC states as follows: The annual forecasts include non-transportation customer volumes with the exception of the design day which additionally include the transportation customers that have elected firm backup service. CGC projects the design day throughput and does not produce a peak day forecast. Since peak day forecasts were not produced, the design day projections are provided as an

alternative. See the CRMA DR 2-24 CONFIDENTIAL Attachment that provides the information available.

2-25. Provide the actual annual consumption and peak day for the period 2011 through 2021.

CGC RESPONSE:

Subject to any objections it may offer, CGC is continuing to assess whether and to what extent it may be able to compile some or all of this information in a timely manner.

CGC SUPPLEMENTAL RESPONSE (June 16, 2022):

CGC's original response to CRMA DR 2-24 was actually the substantive response to CRMA DR 2-25, and the CRMA DR 2-24 CONFIDENTIAL Attachment is responsive to CRMA DR 2-25 and is not confidential. Thus, CGC states as follows:

CGC objects to this request as overly broad and unduly burdensome, seeking privileged and/or confidential information, and not reasonably calculated to lead to the discovery of admissible evidence. The purpose of this docket is to establish a penalty for those T-1, T-2, and T-3 customers who fail to nominate gas deliveries on a daily basis or who may materially under- or over-schedule and not maintain daily balances, and by whose actions, inappropriately shift costs from the transportation customers to the sales customers. This docket is not about CGC's gas forecasts, but the actions certain customers take to the detriment of other customers. Subject to and without waiving the foregoing objections, CGC states as follows: See the table below with the historic information being provided. Please note that the Annual Total and Peak Day load represents all load from all customer classes.

	Annual Total (Dth)	Peak Day (Dth)
2011	15,201,302	111,569
2012	13,646,626	103,146
2013	16,000,945	92,985
2014	16,153,670	134,821
2015	14,542,754	126,499
2016	14,503,249	115,823
2017	13,494,686	108,038
2018	15,464,175	129,424
2019	14,911,931	108,713
2020	14,556,350	110,983
2021	15,161,639	118,020

RESPECTFULLY SUBMITTED this 21st day of June, 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 were forwarded via electronic mail on Thursday, June 16, 2022, to the following:

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