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August 2, 2022

Electronically Filed in TPUC Docket  
Room on August 2, 2022 at 2:02 p.m.

Chairman Herb Hilliard  
ATTN: Ectory Lawless, Docket Clerk  
Tennessee Public Utility Commission  
502 Deaderick Street, 4<sup>th</sup> Floor  
Nashville, TN 37243

Re: *Chattanooga Gas Company's Petition for Approval of Its 2021 Annual  
Rate Review Filing Pursuant to T.C.A. § 65-5-103(d)(6)*  
Docket No. 22-00032

Dear Chairman Hilliard:

Enclosed please find on behalf of Chattanooga Gas Company ("CGC"), Revised Rebuttal Testimony of Archie Hickerson and Paul Leath. The Revised Rebuttal Testimonies are being filed for these two witnesses based upon the agreement of the parties and the concurrence of the Hearing Officer to transfer the incremental gas issue to Docket 22-00004. Therefore, these revised testimonies reflect the elimination of this issue that is no longer in Docket No. 22-00032. Likewise, CGC withdraws from this Docket the Joint Testimony of Greg Becker and Chris Bellinger, since their joint testimony went exclusively to the incremental gas issue. There are no changes to the Tiffani Weems Supplemental Testimony, which shall remain part of Docket No. 22-00032.

Please do not hesitate to contact me if you have any questions or concerns.

Yours truly,

Butler Snow LLP



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1    **I.       WITNESS INTRODUCTION.**

2    **Q.       Please state your name, position and address.**

3    A.       I am Paul Leath, Regional Director of Operations, Chattanooga Gas (“Company”  
4            or “CGC”) and Northeast Georgia. My business address is 2207 Olan Mills Drive,  
5            Chattanooga, Tennessee, 37421.

6    **Q.       Did you file direct testimony in this proceeding?**

7    A.       Yes.

8    **Q.       What is the purpose of your rebuttal testimony?**

9            The purpose of my rebuttal testimony is to present information for the Company in  
10           response to the direct testimony of witness Mr. Alex Bradley filed on behalf of the  
11           Consumer Advocate Unit in the Financial Division of the Tennessee Attorney  
12           General’s Office (“Consumer Advocate”). More specifically, I will respond to Mr.  
13           Bradley’s recommendations that the Commission require CGC “to communicate,  
14           through a bill insert and a media release, the estimated increase in the average  
15           residential bill for the period December 2022 through February 2023 compared  
16           with the same period from the previous year.” Consumer Advocate Direct  
17           Testimony, Alex Bradley, p. 8, l. 16-21.

18   **Q.       Are any other Company witnesses submitting rebuttal testimony?**

19   A.       Yes. Mr. Archie Hickerson is also filing rebuttal testimony to the Consumer  
20           Advocate and CRMA regarding the appropriate rate design for new rates. In  
21           addition, Ms. Tiffani Weems provides supplemental testimony regarding the  
22           undisputed prescribed revenue recovery or total rate adjustment and an updated

1 ARM Model reflecting the adjustments that have been made to reduce the total  
2 revenue recovery.

3 **Q. Are you sponsoring any exhibits with your rebuttal testimony?**

4 A. No.

5 **II. CUSTOMER NOTIFICATION**

6 **Q. Do you have a general response to Mr. Bradley's recommendations regarding**  
7 **customer notification?**

8 A. Yes. The Company agrees with Mr. Bradley that customer notification is  
9 important, and we are happy to provide some additional or improved customer  
10 communications regarding this proceeding and its rate changes. However, given  
11 the nature of our customer base and billing process, we have worked with the  
12 Consumer Advocate and have come to agreement on some modifications to Mr.  
13 Bradley's recommendations that will still help to meaningfully inform our  
14 customers of the Commission's decision in this Docket.

15 **Q. What does the Company propose in terms of customer notification?**

16 A. The Company proposes multiple avenues of customer notification, summarized as  
17 follows:

- 18 • CGC will develop a website devoted to information regarding this Docket,  
19 including information as to the estimated increase in the average residential  
20 bill for the period December 2022 through February 2023 compared with  
21 the same period from the previous year.
- 22 • CGC will include a message on bills – including both paper bills and

1 electronic bills (“eBills”), as appropriate – with information regarding this  
2 Docket, including a link to this new website we have developed.

- 3 • CGC will include in its press release regarding this Docket information  
4 reflecting the estimated increase in the average residential bill for the period  
5 December 2022 through February 2023 compared with the same period  
6 from the previous year.

- 7 • CGC will include in its two newspaper advertisements regarding this  
8 Docket information reflecting the estimated increase in the average  
9 residential bill for the period December 2022 through February 2023  
10 compared with the same period from the previous year.

- 11 • CGC will include in its newsletter emailed to all customers information as  
12 to the estimated increase in the average residential bill for the period  
13 December 2022 through February 2023 compared with the same period  
14 from the previous year.

15 **Q. What aspects of the Company’s billing process make the Company’s proposal**  
16 **better suited to inform customers?**

17 A. Most notably, nearly 50% of CGC’s customers receive electronic bills. Therefore,  
18 in our experience, a bill insert is not an effective way of communicating  
19 information. In addition, a bill insert costs approximately \$7,000. We believe  
20 CGC’s proposal is better suited at ensuring that customers see the information in a  
21 way that is meaningful to them at a lower cost. Finally, by pursuing multiple avenues  
22 of customer notification, the Company’s proposal will help ensure that more

1 customers have access to and an opportunity to review the relevant information  
2 about this process and the resulting rate increase.

3 **Q. Does this conclude your rebuttal testimony?**

4 **A. Yes.**