

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

**IN RE:**

**CHATTANOOGA GAS  
COMPANY PETITION FOR  
APPROVAL OF ITS ANNUAL  
RATE REVIEW FILING  
PURSUANT TO TENN. CODE  
ANN. § 65-5-103(d)(6)**

**Docket No. 22-00032**

**FIRST 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**

A. "The Company," "CGC" and "Chattanooga" all refer to the Chattanooga Gas Company, as well as its agents, attorneys, representatives or any other person acting or purporting to act on its behalf.

B. "And" and "or" shall be construed conjunctively or disjunctively as necessary to make the interrogatory inclusive rather than exclusive. The singular shall include the plural, and vice-versa, where appropriate.

C. "Communication" means any transmission of information by oral, graphic, written, pictorial, or otherwise perceptible means including, but not limited to, telephone conversations, letters, memoranda, electronic correspondence, meetings and personal conversations.

D. "Document" means, in the broadest sense possible, any medium upon which information has been recorded or retrieved, whether in draft or final form, and includes the original and each copy thereof if the copy contains additional material or is not identical to the original, which is in your or your agent's possession, custody or control or which was, but is no longer, in your or your agent's possession, custody or control.

E. The word "identify" with respect to:

- (1) any natural person, means to state the full name; telephone number; and the last known residence and business addresses of the person and that person's relationship, whether business, commercial, professional, or personal with you;
- (2) any legal person, business entity or association, means to state the full name; telephone number; and last known address of such person or entity;
- (3) any document, means to state the type of document (e.g., a letter); the title; the subject matter; the date the document bears and the date it was written; and
- (4) any oral communication, means to state the date when and the place where it was made; the identity of the person who made it; the identity of the

person to whom it was made; the identity of any other person or persons who were present or who heard it; and the substance of it.

F. "Person" shall mean an individual, partnership, proprietorship, corporation, association, and any other kind of business or legal entity.

G. "Relates to" means constitutes, contains, records, discusses, summarizes, discloses, and/or refers to, in whole or in part.

H. "Petition," "case," "proceeding," and "docket" refer to the above-captioned docket.

## **INSTRUCTIONS**

1. To the extent that the information sought is incorporated or contained in a document, please identify the document.

2. If you object to a question on the basis of privilege, state in detail the facts on which you base your objection. If you claim a document is privileged, identify the document and state the basis for the privilege.

3. These interrogatories shall be deemed to be continuing and to require supplemental answers to the extent required by the Tennessee Rules of Civil Procedure and the rules of the Tennessee Regulatory Authority.

## **FIRST ROUND OF DISCOVERY REQUESTS**

1. 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:**

2. 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:**

3. 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:**

4. 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:**

5. Based on CGC's current load forecasting model for gas system requirements, please provide the anticipated Heating Degree Days (HDD), when the LNG plant will be needed to provide peaking.

**RESPONSE:**

6. Based on CGC's recent addition of firm transportation capacity from East Tennessee, (February 2022), please provide the anticipated Heating Degree Days (HDD), when the LNG plant will be needed to provide peaking.

**RESPONSE:**

7. 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:**

8. The recent Exeter Report made recommendations to CGC that they needed to consider off systems sales transactions using their LNG plant for displacement. Please provide any provisions that CGC has made in the current AMA agreement that would allow for this type of transaction. 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:**

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

**RESPONSE:**

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

**RESPONSE:**

11. Provide the forecasting spreadsheet in excel format.

**RESPONSE:**

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

**RESPONSE:**

13. 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:**

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

**RESPONSE:**

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

**RESPONSE:**

16. Provide an explanation of LNG facility improvement projects that have been undertaken over the past five years, or are planned. For any planned project provide the capital cost estimate, and construction timetable.

**RESPONSE:**

17. Explain why since 2018 there have been no sales of LNG to non-system supply customers of the Company or off-system customers.

**RESPONSE:**

18. Confirm that the capital cost of the LNG facility is currently being recovered in base rates and allocated to all customer classes.

**RESPONSE:**

19. Confirm that the capital cost of the LNG facility is being recovered in rates charged to transportation customers.



Respectfully Submitted,

By: 

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## CERTIFICATE OF SERVICE

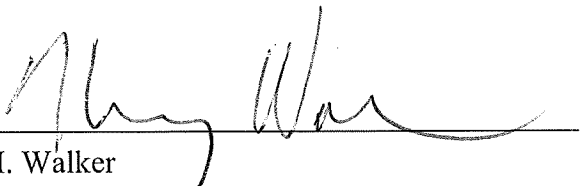
I hereby certify that I have on this 5<sup>th</sup> day of May, 2022, a copy of the foregoing document was served on the parties of record, via electronic email transmission and regular U.S. Mail, postage prepaid, addressed as follows:

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