

BUTLER | SNOW

May 27, 2022

Chairman Kenneth C. Hill
ATTN: Ectory Lawless, Docket Clerk
Tennessee Public Utility Commission
502 Deaderick Street, 4th Floor
Nashville, TN 37243

Electronically Filed in TPUC Docket
Room on May 27, 2022 at 2:20 p.m.

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 Hill:

Enclosed are CGC's supplemental responses to the following first round of Discovery Requests from the Consumer Advocate:

- CA 1-16
- CA 1-23 (contains 2 CONFIDENTIAL Excel attachments which will be filed under seal and provided electronically)
- CA Informal DR-1 (with Excel attachment)

The above referenced supplemental responses have previously been provided electronically to all parties.

Yours truly,

Butler Snow LLP



J.W. Luna

JWL/cb
Enclosures

T 615.651-6700
F 615.651.6701
www.butlersnow.com

Jones Wilson (J.W.) Luna
T 615-651-6749
jw.luna@butlersnow.com

150 3rd Ave. South
Suite 1600
Nashville, TN 37201

Butler Snow LLP

Chattanooga Gas Company
Docket No. 22-00032
Chattanooga Gas Company's 2021 Annual Rate Review

Consumer Advocate's Discovery Requests Set: CA DR 1-16

Updated May 25, 2022

Request 1-16:

Source & Support/Hard-coded data. Refer to the Direct Testimony of Tiffani Weems, File <CGC Weems Exhibit TW-1 (ARM Model and Schedules)>, Tab "Schedule 17.1", Cell O20, which shows the normalized special contract revenue. Provide the source and support for this amount that appears here as an unreferenced hard-coded number.

CGC RESPONSE (May 20, 2022):

The normalized special contract revenue in Cell O20 includes the revenue from the previously existing special contract and the new special contract approved in TPUC Docket 21-00094. See Confidential Schedule 35.15.

CGC RESPONSE (Supp May 25, 2022)

The normalized special contract revenue in Cell O20 includes the revenue from the new special contract approved in Docket 21-00094. See Confidential Schedule 35.15.

Witness: Archie Hickerson
Director, Rates and Tariffs Administration
Southern Company Gas

Chattanooga Gas Company
Docket No. 22-00032
Chattanooga Gas Company's 2021 Annual Rate Review

Consumer Advocate's Discovery Request, CA DR 1-23

Updated May 24, 2022

REQUEST 1-23:

Refer to the costs recorded to FERC account 920 for the periods 2020 and 2021. For each employee whose costs are charged in total, or in part, to FERC account 920 for these two periods provide the following:

- a. Identify/Source & Support. Salary for 2020 and 2021 by employee;
- b. Identify/Source & Support. Incentive compensation for 2020 and 2021 by type, by employee; and
- c. Identify/Source & Support. For any employee whose compensation is not charged exclusively to account 920, provide the applicable account distribution for that employees' compensation for 2020 and 2021.

CGC RESPONSE (May 20, 2022): CGC is still working on information that would be responsive to this request. CGC believes it can be ready in the next one or two business days.

CGC RESPONSE (Supp. May 24, 2022):

- a. Please see CA 1-23a Attachment CONFIDENTIAL for ending salaries for each CGC employee for 2020 and 2021.
- b. Please see CA 1-23b Attachment CONFIDENTIAL for the incentive compensation paid to each CGC employee for 2020 and 2021, the amounts were paid in 2021 and 2022, respectively. Please note, no LTI was paid to CGC employees. All expensed incentive compensation is recorded to FERC account 920.
- c. Please see CA 1-23b Attachment CONFIDENTIAL for the fixed compensation paid to each CGC employee for 2020 and 2021 by FERC account.

Witness: Tiffani Weems
Supervisor, Regulatory Reporting
Southern Company Gas

Chattanooga Gas Company
Docket No. 22-00032
Chattanooga Gas Company's 2021 Annual Rate Review

Consumer Advocate's Informal Discovery Request

INFORMAL DR 1:

During the May 24, 2022, informal discovery meeting with the parties, the Consumer Advocate requested that CGC provide mapping that ties Schedule 24.2 back to general ledger.

CGC RESPONSE:

Please refer to CA Informal DR 1 Attachment. On this Attachment, CGC has provided the Income Statement by department for Service Provider, External Affairs. The allocated costs tie to the Services Company Invoice. The Services Company Invoice ties into to the Services Company Ledger.

On the tab labeled "IS – External Affairs", please refer to Lines 62 and 65. These costs tie to line 49, 50, 51 of the tab labeled "Total Invoice", also provided in Schedule 23. Additionally, line 181 of the "Total Invoice" tab ties to line 362 on the Services Company ledger, provided on the tab labeled "IS – AGSC".

Witness: Tiffani Weems
 Supervisor, Regulatory Reporting
 Southern Company Gas