

January 5, 2023

Electronically Filed in TPUC Docket  
Room on January 5, 2023 at 11:59 a.m.

**VIA ELECTRONIC FILING**

Hon. Herb Hilliard, Chairman  
c/o Ectory Lawless, Docket Room Manager  
Tennessee Public Utility Commission  
502 Deaderick Street, 4<sup>th</sup> Floor  
Nashville, TN 37243  
[TPUC.DocketRoom@tn.gov](mailto:TPUC.DocketRoom@tn.gov)

**RE: *In Re: Expedited Petition of West Tennessee Gas Pipeline, LLC for the  
Issuance of a Certificate of Public Convenience and Necessity***  
**TPUC Docket No. 22-00138**

Dear Chairman Hilliard:

Attached for filing please find an updated *Exhibit E to the Petition of West Tennessee Gas Pipeline, LLC for the Issuance of a Certificate of Public Convenience and Necessity*, which replaces the original Exhibit E filed on December 19, 2022.

As required, the original plus four (4) hard copies will be mailed to your office. Should you have any questions concerning this filing, or require additional information, please do not hesitate to contact me.

Very truly yours,

BUTLER SNOW LLP

Melvin J. Malone

clw

Attachment

cc: Russ Stoots, Brownsville Energy Authority  
J.W. Luna, Butler Snow LLP  
Vance L. Broemel, Consumer Advocate Division  
Karen H. Stachowski, Consumer Advocate Division

# EXHIBIT E

## BROWNSVILLE ENERGY AUTHORITY

ELECTRIC / GAS / WATER / WASTEWATER

25 NORTH LAFAYETTE • P.O. BOX 424 • BROWNSVILLE, TENNESSEE 38012 • 731-772-8845

January 4, 2023

Earl Taylor  
Executive Director  
Tennessee Public Utility Commission  
502 Deadrick Street  
Nashville, TN 37219  
[earl.taylor@tn.gov](mailto:earl.taylor@tn.gov)

Robert Mitchell  
Chief Operating Officer  
West Tennessee Gas Pipeline, LLC  
6100 South Yale, Suite 2050  
Tulsa, OK 74136  
[rmitchell@carreragas.com](mailto:rmitchell@carreragas.com)

RE: WEST TENNESSEE GAS PIPELINE, LLC

Dear Mr. Taylor:

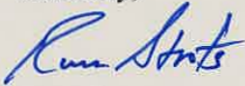
West Tennessee Gas Pipeline, LLC ("WTGP") plans to build, own and operate an intrastate natural gas pipeline to transport natural gas to Ford Motor Company's Blue Oval City Project in Haywood County, Tennessee, approximately 40 miles northeast of Memphis, Tennessee. Ford Motor Company ("Ford") will produce electric trucks, and SK Innovation will produce electric batteries for the trucks. Brownsville Energy Authority ("BEA")<sup>1</sup> is familiar with the project.

BEA provides natural gas service in Haywood County near the Project, but BEA does not have the ability or capacity to serve the Ford and SK Innovation plant facilities. Therefore, Ford and SK Innovation will be served by WTGP.

To support these plant facilities, an area at the mega site will be designated as a Supplier Park, to be occupied by entities other than Ford or any affiliate of Ford that will render services to Ford and SK Innovation. Ford has agreed that BEA shall be the exclusive distributor of natural gas service to all facilities and operations to be located in the Supplier Park. To facilitate that service, BEA plans to request a tap from WTGP.

BEA fully supports this approach, including the permitting and construction of WTGP's plans to build a gas pipeline. BEA understands that WTGP is required to submit a petition for a Certificate of Convenience and Necessity to the Tennessee Public Utility Commission seeking approval and authority to provide these services. BEA will not oppose WTGP's petition.

Sincerely,



Russ Stoots  
General Manager

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<sup>1</sup> BEA was created by a 2008 Private Act of the state legislature to be the successor to the Brownsville Utilities Department, which has served the people of Brownsville and parts of Haywood County with electricity, water, wastewater, natural gas and propane for over 60 years. <http://www.budutil.com/>

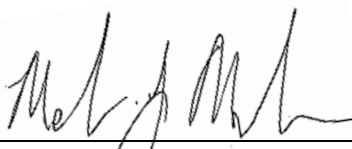
CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served via U.S. Mail or electronic mail upon:

Vance L. Broemel, Esq.  
Senior Assistant Attorney General  
Office of the Tennessee Attorney General  
Consumer Advocate Division  
P.O. Box 20207  
Nashville, TN 37202-0207  
[Vance.Broemel@ag.tn.gov](mailto:Vance.Broemel@ag.tn.gov)

Karen H. Stachowski, Esq.  
Senior Assistant Attorney General  
Office of the Tennessee Attorney General  
Consumer Advocate Division  
P.O. Box 20207  
Nashville, TN 37202-0207  
[Karen.Stachowski@ag.tn.gov](mailto:Karen.Stachowski@ag.tn.gov)

This the 5<sup>th</sup> day of January 2023.

  
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Melvin J. Malone