

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

**April 14, 2023**

<b>IN RE:</b>	)	
	)	
<b>RULEMAKING TO PROMULGATE RULES</b>	)	<b>Docket No.</b>
<b>FOR UTILITY CYBERSECURITY PLAN</b>	)	
<b>REPORTING AS REQUIRED UNDER TENN.</b>	)	<b>23-00001</b>
<b>CODE ANN. § 65-4-127</b>	)	
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**CHATTANOOGA GAS COMPANY’S COMMENTS ON REVISED PROPOSED RULE**

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Chattanooga Gas Company (“CGC” or “Company”) hereby submits its Comments in response to the Notice of Open Docket for Filing Limited Comments, issued March 31, 2023 (“Notice”). Pursuant to the Commission’s Notice seeking comments on the revised proposed rule, CGC provides the following:

1. CGC appreciates consideration of the comments the Company provided on March 14, 2023, and believes the revised proposed rule is substantially improved. In particular, CGC is supportive of the revised definitions of “Information Technology System” and “Operational Technology System” in revised proposed rule 1220-04-15-.01 and the revision to the insurance requirement in proposed rule 1220-04-15-.04.

2. CGC is also supportive of a change to the notification requirement in proposed rule 1220-04-15-.06. As revised, however, the proposed rule is unclear as to whether it applies only to cybersecurity events or *all* “incidents that result in disruption of service.” Of course, Commission Rule 1220-04-05-.36(1)(c) already applies to “interruption to the service of a major portion of [the Company’s] distribution system.” Pursuant to Rule 1220-05-05-.03(l), “Interruption of Service”

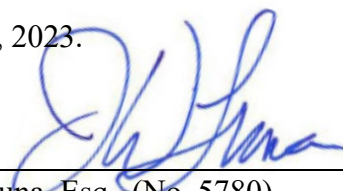
“[m]eans any unplanned disturbance of the gas supply whereby the pilot flame on the appliances of at least fifty (50) customers shall have been extinguished.” Given the existing rule, CGC suggests that the proposed rule be revised to specify its application only to cybersecurity events and to refer to “interruption of service,” a defined term, rather than “disruption of service,” an undefined term. More specifically, the Company suggests the following:

1220-4-15-.06 Required Notification to Commission

All utilities shall electronically notify the Commission’s Executive Director of any cybersecurity incidents that result in an interruption of service ~~disruption of service~~.

3. CGC appreciates the Commission’s invitation to provide comments regarding revised proposed rule and looks forward to participating in any further proceedings the Commission may conduct in this docket.

Respectfully submitted this 14<sup>th</sup> day of April, 2023.



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