

24-00024

1 **Q. PLEASE STATE YOUR NAME, POSITION AND ADDRESS.**

2 A. Tiffani Weems, Manager, Regulatory Reporting, Southern Company Gas (“SCG”).

3 My business address is 10 Peachtree Place, Location 1686, Atlanta, Georgia 30309.

4 **Q. Are you the same Tiffani Weems who previously filed direct testimony in this**
5 **proceeding?**

6 A. Yes, I am.

7 **Q. What is the purpose of your supplemental testimony?**

8 A. The purpose of my supplemental testimony is to present information to the
9 Commission concerning the revisions to the filed 2024 Annual Review Mechanism
10 (“2023 ARM”) docket for the 2023 Historic Base Period that was filed by
11 Chattanooga Gas Company (“CGC”) on April 19, 2024, and to support the
12 Settlement and Stipulation Agreement (“Agreement”) to be filed in this proceeding
13 no later than July 22, 2024. The revisions to the 2024 ARM and the Agreement are
14 the result of discussions and negotiations between CGC and the Consumer
15 Advocate.

16 **Q. ARE YOU SPONSORING ANY EXHIBITS?**

17 A. Yes, I am sponsoring Exhibit TW-3. Exhibit TW-3 is a revised version of Exhibit
18 TW-1 that was attached to my direct testimony.

19 **Q. HOW DO YOU CHARACTERIZE THE REVISIONS TO THE 2024 ARM**
20 **DOCKET FILING?**

21 A. The revisions to the 2024 ARM Docket filing were made through the discovery
22 process and negotiations between CGC and the Consumer Advocate. Corrections and
23

adjustments have been identified in Schedule 1 of Exhibit TW-3.

1 **Q. PLEASE DISCUSS THE CORRECTIONS OR ADJUSTMENTS**
2 **IDENTIFIED IN EXHIBIT TW-3.**

3 **A.** During the discovery process and subsequent negotiations, the Company made a
4 number of corrections and adjustments increasing the total rate adjustment by
5 \$354,925. Schedule 1 of Exhibit TW-3 includes a line item for each type of
6 correction, identifying the impact to the deficiency, rate reset and total rate
7 adjustment. Additionally, Schedule 1 includes the location of the
8 corrections/adjustments within the ARM model as well as notes regarding the
9 adjustments.

10 **Q. WHAT IS THE TOTAL RATE ADJUSTMENT INCLUDING**
11 **CORRECTIONS AND ADJUSTMENTS?**

12 **A.** The initial filing included a total rate adjustment of \$8,422,852, after adjustments
13 identified during the discovery process and negotiated by the parties, the total rate
14 adjustment presented for Commission approval for the 2023 ARM Docket filing is
15 \$8,777,776.

16 **Q. IS THE TOTAL RATE ADJUSTMENT OF \$8,777,776 WHAT THE**
17 **PARTIES ARE PROPOSING TO RECOVER IN RATES BEGINNING**
18 **SEPTEMBER 1?**

19 **A.** No. In the 2021 ARM Order, the Commission approved, as requested by CGC and
20 stipulated by the Consumer Advocate, a voluntary limit on the rate increase for the
21 Historic Base Period years 2020 through 2023 of up to \$6.8 million annually, with
22 any under-recovered amount rolling to the next year's recovery. The request was
23 proposed and granted due to the size of the 2020 ARM Rate Adjustment and its

1 immediate impact on customers. The Company is requesting approval of the total
2 rate adjustment of \$8,777,776 but since the total rate adjustment is greater than the
3 voluntary rate cap approved by the Commission, the Company is requesting an
4 increase in rates of \$6,800,000, with the unrecovered balance carried over and
5 included in next year's ARM Docket.

6 **Q. DID THE COMPANY MAKE ANY ADDITIONAL CORRECTIONS TO**
7 **THE ARM FILING BEYOND THOSE IDENTIFIED DURING**
8 **DISCOVERY AND SUBSEQUENT NEGOTIATIONS?**

9 **A.** Yes. The Company identified a minor error in the customer charges for Kordsa,
10 Inc. reflected in Confidential Schedule 35.15 and Exhibit AV-4, reflecting 2022
11 rates rather than 2023 rates. Confidential Schedule 35.15 and Exhibit AV-4 have
12 been updated to reflect the correction. The correction is also reflected on Schedule
13 17 of Exhibit TW-3. Please note that this correction has no impact on the total rate
14 adjustment or the overall rate increase.

15 **Q. DOES THIS CONCLUDE YOUR SUPPLEMENTAL TESTIMONY IN**
16 **SUPPORT OF THE STIPULATION AND SETTLEMENT AGREEMENT?**

17 **A.** Yes.