

**IN THE TENNESSEE PUBLIC UTILITY COMMISSION  
AT NASHVILLE, TENNESSEE**

<b>IN RE:</b>	)	
	)	
<b>CHATTANOOGA GAS COMPANY</b>	)	
<b>PETITION FOR EXTENSION OF ITS PIPE</b>	)	<b>DOCKET NO. 25-00021</b>
<b>REPLACEMENT PROGRAM</b>	)	
	)	

---

**PETITION TO INTERVENE**

---

The Consumer Advocate Division of the Office of the Attorney General (“Consumer Advocate”), by and through Jonathan Skrmetti, Attorney General and Reporter for the State of Tennessee, pursuant to Tenn. Code Ann. § 65-4-118, respectfully petitions the Tennessee Public Utility Commission (“TPUC” or the “Commission”) to grant the Consumer Advocate’s intervention into this proceeding because consumers’ interests, rights, duties, or privileges may be determined or affected by the *Chattanooga Gas Company Petition for Extension of Its Pipe Replacement Program* (“*Petition*”) filed by Chattanooga Gas Company (“CGC” or the “Company”). The Consumer Advocate would show as follows:

1. The Consumer Advocate is authorized by Tenn. Code Ann. § 65-4-118 to represent the interests of Tennessee consumers of public utility services by initiating and intervening as a party in proceedings before the Commission in accordance with the Uniform Administrative Procedures Act and Commission rules.

2. CGC is a public utility regulated by the Commission and provides natural gas service to residential, commercial, and industrial customers in Tennessee. CGC’s principal office and place of business is located at 2207 Olan Mills Drive, Chattanooga, Tennessee

37421.<sup>1</sup>

3. In 2020, CGC filed a Petition for Approval of its Pipeline Replacement Program (“PRP”) and sought approval of its targeted plan to continue to replace its aging steel and plastic pipeline infrastructure.<sup>2</sup>

4. CGC sought approval to replace seventy-three miles of mains over seven years at an estimated cost of \$118 million, with the actual costs incurred each year to be recovered through the Company’s ARM process.<sup>3</sup>

5. CGC began implementation of the PRP in 2022 and has completed replacement of 24.8 miles of the total 73 miles with a total investment of approximately \$25.9 million of the \$118 million.<sup>4</sup>

6. CGC stated that in order to complete the entire 73 miles within the original seven-year timeframe, it would need to accelerate the number of miles replaced each year and its PRP investment. In order to avoid this, they are seeking an extension of the timeframe to complete the original project.

7. According to CGC, without this requested extension, an accelerated construction schedule in 2026, 2027, and 2028 will place more than half of the new pipe in service in the next three years, at a cumulative estimated cost in excess of \$80 million

8. CGC stated that such a rapid pace of replacement for customers would result in

---

<sup>1</sup> *Chattanooga Gas Company Petition for Extension of Its Pipe Replacement Program*, at ¶ 3, TPUC Docket No. 25-00021 (March 14, 2025).

<sup>2</sup> *Chattanooga Gas Company Petition for Extension of its Pipe Replacement Program*, at ¶ 8, TPUC Docket No. 25-00021 (March 14, 2025). *Chattanooga Gas Company Petition to for Approval of Its Pipe Replacement Program*, TPUC Docket No. 20-00131 (Dec. 2, 2020).

<sup>3</sup> *Chattanooga Gas Company Petition for Extension of its Pipe Replacement Program*, at ¶ 8, TPUC Docket No. 25-00021 (March 14, 2025).

<sup>4</sup> *Id.* at ¶ 9.

significantly higher rate impacts through 2028 versus what would be projected if the PRP is extended for three additional years.<sup>5</sup>


9. CGC is seeking authority to extend the PRP an additional three years, but stated it is not seeking approval for the recovery of any costs in this Petition. CGC will address recovery of its actual costs each year in the annual ARM docket.<sup>6</sup>

10. In the instant matter, the Consumer Advocate seeks to represent the interests of consumers served by CGC. The interests of consumers may be affected by determinations and orders made by the Commission with respect to: (1) the interpretation, application, and implementation of Tenn. Code Ann. § 65-5-103(d)(6) and other relevant statutory and regulatory provisions; and (2) the review and analysis of the supporting schedules and other documentation, financial spreadsheets, and materials provided by CGC.

11. Only by participating in this proceeding can the Consumer Advocate carry out its statutory duty to represent the interests of consumers.

WHEREFORE, the Consumer Advocate respectfully requests that the Commission grant this *Petition to Intervene*.

RESPECTFULLY SUBMITTED,

  
JONATHAN SKRMETTI (BPR No. 031551)  
Attorney General and Reporter  
State of Tennessee

---

<sup>5</sup> *Id.* at ¶¶ 9-10.

<sup>6</sup> *Id.* at ¶ 14.



**SHILINA B. BROWN** (BPR No. 020689)

Senior Assistant Attorney General

Office of the Tennessee Attorney General

Consumer Advocate Division

P.O. Box 20207

Nashville, Tennessee 37202-0207

Phone: (615) 741-2357

Fax: (615) 741-1026

Email: [Shilina.Brown@ag.tn.gov](mailto:Shilina.Brown@ag.tn.gov)

**TPUC Docket No. 25-00021**

*Consumer Advocate's Petition to Intervene*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served via electronic mail upon:


J.W. Luna, Esq.  
Butler Snow LLP  
The Pinnacle at Symphony Place  
150 3rd Ave S, Ste. 1600  
Nashville, TN 37201  
Email: [jw.luna@butlersnow.com](mailto:jw.luna@butlersnow.com)

Floyd R. Self, Esq.  
Berger Singerman, LLP  
313 North Monroe Street, Suite 301  
Tallahassee, FL 32301  
Telephone: (850) 521-6727  
Email: [fself@bergersingerman.com](mailto:fself@bergersingerman.com)

Jason Willard  
Director, External Affairs  
Chattanooga Gas Company  
2207 Olan Mills Drive  
Chattanooga, TN 37421  
Email: [jwillar@southernco.com](mailto:jwillar@southernco.com)

Elizabeth Wade, Esq.  
Chief Regulatory Counsel  
Kasey Chow, Esq.  
Senior Counsel  
Southern Company Gas  
Ten Peachtree Place, NW  
Atlanta, GA 30309  
Telephone: (404) 584-3160  
Email: [ewade@southernco.com](mailto:ewade@southernco.com)  
Email: [kchow@southernco.com](mailto:kchow@southernco.com)

This the 10<sup>th</sup> day of April 2025.

  
**SHILINA B. BROWN**  
Senior Assistant Attorney General