

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

April 10, 2025

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

**CHATTANOOGA GAS COMPANY’S ADDITIONAL RESPONSES AND OBJECTIONS
TO CONSUMER ADVOCATE’S INFORMAL DISCOVERY REQUESTS**

Chattanooga Gas Company (“CGC” or “Company”) files these Responses and Objections to the Informal Discovery Requests of the Consumer Advocate Division of the Office of the Attorney General (“Consumer Advocate”) filed on March 24, 2025.

To assist the Hearing Officer in evaluating this matter, CGC is setting forth its objections and Responses in two parts. Part I sets forth general objections applicable to CGC’s discovery Responses. Part II sets forth objections to specific discovery requests propounded by the Consumer Advocate.

I. GENERAL OBJECTIONS

CGC objects generally to any definitions or instructions to the extent that they are inconsistent with and request information that is beyond the scope of the Tennessee Rules of Civil Procedure. CGC’s Responses will comply with the requirements of the Tennessee Rules of Civil Procedure.

Any requests for production of documents are interpreted to describe each item or category of items requested with reasonable particularity as required by Tenn. R. Civ. P. 34.02, and the

terms used in the requests are not interpreted “broadly.” CGC will produce items and/or data in its possession, custody or control as required by Tennessee Rules of Civil Procedure.

CGC further objects to these discovery requests to the extent they seek information that is beyond the scope of legitimate discovery in this case or that is subject to any privilege, including the attorney-client privilege and/or attorney work product doctrine. However, without waiving any of these General Objections, the Company will respond to the Consumer Advocate’s discovery requests by providing responsive, non-privileged information.

These General Objections are continuing and are incorporated by reference in CGC’s Responses to all discovery requests to the extent applicable. The statement of the following additional objections to specific discovery requests shall not constitute a waiver of these General Objections.

Further, CGC is proceeding in the traditional course of providing information that it deems to be confidential in anticipation that, if necessary, TPUC will issue a Protective Order in this docket. CGC is acting in good faith reliance that any such information will be maintained as confidential.

INFORMAL DISCOVERY REQUESTS

See the following pages for each specific informal discovery response.

Chattanooga Gas Company
Docket No. 25-00021
Chattanooga Gas Company's PRP Extension Request

CONSUMER ADVOCATE'S Informal Discovery Requests Set: CA Informal-1

CA Informal 1-1

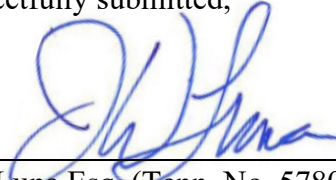
QUESTION:

Refer to page 3 of the *Direct Testimony of Ashley K. Vette* and provide the work papers/supporting documentation for the overview of the projected rate impact of CGC's Pipe Replacement Program ("PRP") under the current seven-year implementation schedule and the proposed three-year extension.

RESPONSE:

In its response to CA Informal 1-1 filed on April 4, 2025, CGC identified a potential ambiguity in the presentation of the rate impact information in the table on page 3 of Ms. Vette's testimony and committed to providing updated information the week of April 7, 2025. Please see CA Informal 1-1 Attachment A, for the updated information and supporting documentation. CGC is continuing to evaluate what, if any, revisions are necessary to the Petition and testimony.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing has been served via electronic mail on this the 10th day April, 2025 to:

Shilina B. Brown
Senior Assistant Attorney General
Office of the Tennessee Attorney General
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J.W. Luna



ATTACHMENT A

			2027	2028	2029	2030
		Revenue Requirement Impact	\$ 960,009	\$ 2,534,397	\$ 2,065,376	\$ (737,021)
		Monthly Bill Impact with 10 Year PRP Program vs 7 Year Program				
			2027	2028	2029	2030
		Residential R-1	\$ (0.62)	\$ (1.78)	\$ (1.51)	\$ 0.56
		Small Commercial C-1	\$ (1.32)	\$ (3.77)	\$ (3.20)	\$ 1.18
		Industrial F-1 T-2	\$ (288.18)	\$ (819.68)	\$ (695.46)	\$ 255.25
		Rate Impact with 10 Year PRP Program vs 7 Year Program				
		Residential R-1	2027	2028	2029	2030
		Winter Base Use Charge	\$ (0.52)	\$ (1.40)	\$ (1.19)	\$ 0.44
		Summer Base Use Charge	\$ (0.43)	\$ (1.16)	\$ (0.98)	\$ 0.36
		Commodity Charge/Therm	\$ (0.00361)	\$ (0.00969)	\$ (0.00823)	\$ 0.00304
		Small Commercial C-1	2027	2028	2029	2030
		Winter				
		Base Use Charge	\$ (0.96)	\$ (2.59)	\$ (2.20)	\$ 0.81
		Commodity Charge/Therm	\$ (0.00575)	\$ (0.01542)	\$ (0.01310)	\$ 0.00484
		Summer				
		Base Use Charge	\$ (0.83)	\$ (2.23)	\$ (1.90)	\$ 0.70
		Commodity Charge/Therm	\$ (0.00451)	\$ (0.01211)	\$ (0.01029)	\$ 0.00380
		Industrial F-1 T-2	2027	2028	2029	2030
		Base Use Charge	\$ (9.30)	\$ (24.94)	\$ (21.19)	\$ 7.82
		Demand Charge	\$ (0.19)	\$ (0.52)	\$ (0.44)	\$ 0.16
		Commodity Charge				
		First 1,500 Dths	\$ (0.0251)	\$ (0.0673)	\$ (0.0571)	\$ 0.0211
		Next 2,500 Dths	\$ (0.0214)	\$ (0.0574)	\$ (0.0488)	\$ 0.0180
		Next 11,000 Dths	\$ (0.0122)	\$ (0.0326)	\$ (0.0277)	\$ 0.0102
		Over 15,000 Dths	\$ (0.0075)	\$ (0.0201)	\$ (0.0171)	\$ 0.0063

1										
2	September									
3										
4	ARM Vintage	2024	2025	2026	2027	2028	2029	2030	2031	2032
5	Effective	September 2025	September 2026	September 2027	September 2028	September 2029	September 2030	September 2031	September 2032	September 2033
6										
7										
8	7yr PRP - Impact	\$ -	\$ -	\$ 960,009	\$ 2,534,397	\$ 2,065,376	\$ (737,021)	\$ -	\$ -	\$ -

	Margin (included in Schedule 17.1 of Docket 24-00024)			\$ 59,611,088						
				Historic Year	<u>2024</u>	<u>2025</u>	<u>2026</u>	<u>2027</u>	<u>2028</u>	<u>2029</u>
				Rate Effective Year	<u>2025</u>	<u>2026</u>	<u>2027</u>	<u>2028</u>	<u>2029</u>	<u>2030</u>
		Rate Impact Variance with 7 Year PRP			0.0%	0.0%	1.6%	4.3%	3.5%	-1.2%
			Base Rates Effective 9/1/2024							
	R-1	WINTER (NOV - APR)								
	Residential	Base Use Charge/Bill	\$32.50	\$	32.50	\$ 32.50	\$ 33.02	\$ 34.42	\$ 35.61	\$ 35.17
	General Service	Commodity Charge/Therm	\$0.22429	\$	0.22429	\$ 0.22429	\$ 0.22790	\$ 0.23759	\$ 0.24582	\$ 0.24278
				\$	-	\$ -	\$ -	\$ -	\$ -	\$ -
		SUMMER (MAY - OCT)		\$	-	\$ -	\$ -	\$ -	\$ -	\$ -
		Base Use Charge/Bill	\$26.80	\$	26.80	\$ 26.80	\$ 27.23	\$ 28.39	\$ 29.37	\$ 29.01
		Commodity Charge/Therm	\$0.22429	\$	0.22429	\$ 0.22429	\$ 0.22790	\$ 0.23759	\$ 0.24582	\$ 0.24278
				\$	-	\$ -	\$ -	\$ -	\$ -	\$ -
	Non-Metered Gas Light	18 Therm per Light per Month	\$0.22429	\$	0.22429	\$ 0.22429	\$ 0.22790	\$ 0.23759	\$ 0.24582	\$ 0.24278
				\$	-	\$ -	\$ -	\$ -	\$ -	\$ -
	C-1	WINTER (NOV - APR)		\$	-	\$ -	\$ -	\$ -	\$ -	\$ -
	Commercial & Industrial	Base Use Charge/Bill	\$59.90	\$	59.90	\$ 59.90	\$ 60.86	\$ 63.45	\$ 65.65	\$ 64.84
	General Service	Flat Rate / Therms	\$0.35703	\$	0.35703	\$ 0.35703	\$ 0.36278	\$ 0.37820	\$ 0.39130	\$ 0.38646
				\$	-	\$ -	\$ -	\$ -	\$ -	\$ -
		SUMMER (MAY - OCT)		\$	-	\$ -	\$ -	\$ -	\$ -	\$ -
		Base Use Charge/Bill	\$51.70	\$	51.70	\$ 51.70	\$ 52.53	\$ 54.76	\$ 56.66	\$ 55.96
		Flat Rate / Therms	\$0.28025	\$	0.28025	\$ 0.28025	\$ 0.28476	\$ 0.29687	\$ 0.30716	\$ 0.30336
				\$	-	\$ -	\$ -	\$ -	\$ -	\$ -
	Non-Metered Gas Light (C-1 & C-2)	WINTER (NOV - APR)		\$	-	\$ -	\$ -	\$ -	\$ -	\$ -
		18 Therm per Light per Month	\$0.35703	\$	0.35703	\$ 0.35703	\$ 0.36278	\$ 0.37820	\$ 0.39130	\$ 0.38646
				\$	-	\$ -	\$ -	\$ -	\$ -	\$ -
		SUMMER (MAY - OCT)		\$	-	\$ -	\$ -	\$ -	\$ -	\$ -
		18 Therm per Light per Month	\$0.28025	\$	0.28025	\$ 0.28025	\$ 0.28476	\$ 0.29687	\$ 0.30716	\$ 0.30336
				\$	-	\$ -	\$ -	\$ -	\$ -	\$ -
	Air Conditioning	SUMMER (MAY - OCT)		\$	-	\$ -	\$ -	\$ -	\$ -	\$ -
		Flat Rate / Therm	\$0.07553	\$	0.07553	\$ 0.07553	\$ 0.07675	\$ 0.08001	\$ 0.08278	\$ 0.08176
				\$	-	\$ -	\$ -	\$ -	\$ -	\$ -
	F-1	Base Use Charge	\$577.40	\$	577.40	\$ 577.40	\$ 586.70	\$ 611.64	\$ 632.83	\$ 625.01
	Large Volume	Demand Charge / Demand Unit	\$12.00	\$	12.00	\$ 12.00	\$ 12.19	\$ 12.71	\$ 13.15	\$ 12.99
	Firm Service	Commodity Charge / Dth		\$	-	\$ -	\$ -	\$ -	\$ -	\$ -
		First 1,500 Dths	\$1.5568	\$	1.5568	\$ 1.5568	\$ 1.5819	\$ 1.6492	\$ 1.7063	\$ 1.6852
		Next 2,500 Dths	\$1.3294	\$	1.3294	\$ 1.3294	\$ 1.3508	\$ 1.4082	\$ 1.4570	\$ 1.4390
		Next 11,000 Dths	\$0.7553	\$	0.7553	\$ 0.7553	\$ 0.7675	\$ 0.8001	\$ 0.8278	\$ 0.8176
		Over 15,000 Dths	\$0.4663	\$	0.4663	\$ 0.4663	\$ 0.4738	\$ 0.4939	\$ 0.5110	\$ 0.5047
				\$	-	\$ -	\$ -	\$ -	\$ -	\$ -
				\$	-	\$ -	\$ -	\$ -	\$ -	\$ -
	T-2	Customer Charge	\$577.40	\$	577.40	\$ 577.40	\$ 586.70	\$ 611.64	\$ 632.83	\$ 625.01
	Interruptible Transportation	Demand Charge/Demand Unit	\$12.00	\$	12.00	\$ 12.00	\$ 12.19	\$ 12.71	\$ 13.15	\$ 12.99
	Service with Firm Backup	Transportation Charge/Dth		\$	-	\$ -	\$ -	\$ -	\$ -	\$ -
		First 1,500 Dths	\$1.5568	\$	1.5568	\$ 1.5568	\$ 1.5819	\$ 1.6492	\$ 1.7063	\$ 1.6852
		Next 2,500 Dths	\$1.3294	\$	1.3294	\$ 1.3294	\$ 1.3508	\$ 1.4082	\$ 1.4570	\$ 1.4390
		Next 11,000 Dths	\$0.7553	\$	0.7553	\$ 0.7553	\$ 0.7675	\$ 0.8001	\$ 0.8278	\$ 0.8176
		Over 15,000 Dths	\$0.4663	\$	0.4663	\$ 0.4663	\$ 0.4738	\$ 0.4939	\$ 0.5110	\$ 0.5047
				\$	-	\$ -	\$ -	\$ -	\$ -	\$ -

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