

STATE OF TENNESSEE

Office of the Attorney General



JONATHAN SKRMETTI
ATTORNEY GENERAL AND REPORTER

P.O. BOX 20207, NASHVILLE, TN 37202
TELEPHONE (615) 741-3491
FACSIMILE (615) 741-2009

Electronically Filed in TPUC Docket
Room on May 29, 2025 at 8:57 a.m.

May 29, 2025

Chairman David Jones
c/o Ms. Tory Lawless, Docket Manager
Tennessee Public Utility Commission
502 Deaderick Street, 4th Floor
Nashville, Tennessee 37242-0001

Re: *Chattanooga Gas Company Petition for Extension of Its Pipe Replacement Program*, TPUC Docket No. 25-00021

Dear Chairman Jones:

On December 2, 2020, the Chattanooga Gas Company ("CGC") filed Chattanooga Gas Company Petition for Approval of Its Pipe Replacement Program, which was approved by the Commission on June 2, 2021. In this current filing, CGC is seeking an "extension" of this program. CGC is not seeking to recover any expenditures in this Docket but rather is requesting that it be allowed to utilize the ARM process.

The Consumer Advocate Division of the Tennessee Attorney General's Office ("Consumer Advocate") has reviewed the Petition and testimony filed within this Docket. Following its initial review, the Consumer Advocate sent informal questions to CGC, and CGC filed its responses on April 4, 2025, and additional responses on April 11, 2025. The Consumer Advocate has completed its review of these responses as well as the Petition and testimony supporting CGC's request for an extension of the PRP and for CGC to seek to recover the actual annual cost for such PRP expenditures through CGC's annual review mechanism. The Consumer Advocate notes that CGC's request does not result in any cost savings for its customers. Rather, there will be lower rate impacts for customers in the earlier years of the project, but the costs will still be recovered, at a later date.

The Joint Proposed Procedural Schedule establishes the deadline of May 30, 2025, for the Intervenor's First Round of Discovery Requests. The Consumer Advocate respectfully expresses its intent not to file any further discovery requests or file testimony. The Consumer Advocate requests that this letter be filed in this Docket.

Respectfully,

A handwritten signature in blue ink that reads "Shilina B. Brown".

Shilina B. Brown
Senior Assistant Attorney General

cc: David Foster, TPUC
Kelly Cashman-Grams, TPUC