

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

IN RE:)	
)	
CHATTANOOGA GAS COMPANY'S)	
PETITION FOR APPROVAL OF ITS)	DOCKET NO. 25-00028
2024 ANNUAL RATE REVIEW)	
FILING PURSUANT TO)	
TENN. CODE ANN. § 65-5-103(d)(6))	
)	

**CONSUMER ADVOCATE'S FIRST SET OF DISCOVERY REQUESTS
TO CHATTANOOGA GAS COMPANY**

This First Set of Discovery Requests is hereby served upon Chattanooga Gas Company, Inc. ("CGC" or the "Company"), pursuant to Rules 26, 33, 34, and 36 of the Tennessee Rules of Civil Procedure and Tenn. Comp. R. & Reg. 1220-01-02-.11. The Consumer Advocate Division of the Tennessee Office of the Attorney General ("Consumer Advocate") requests that full and complete responses be provided pursuant to the Tennessee Rules of Civil Procedure. The responses are to be produced at the Office of the Tennessee Attorney General and Reporter, Consumer Advocate Division, John Sevier Building, 500 Dr. Martin L. King Jr. Blvd., Nashville, Tennessee 37243, c/o Victoria B. Glover on or before Monday, May 19, 2025, at 2:00 p.m. CST.

PRELIMINARY MATTERS AND DEFINITIONS

1. **Continuing Request.** These discovery requests are to be considered continuing in nature and are to be supplemented from time to time as information is received by the Company and any of its affiliates which would make a prior response inaccurate, incomplete, or incorrect.

2. **Clear References.** To the extent that the data or information requested is incorporated or contained in a document, identify the document including page/line number if applicable.

3. **Format of Responses.** Provide all responses in the format in which they were created or maintained, for example, Microsoft Word or Microsoft Excel format with all cells and formulas intact and in working order. If a document (including without limitation a financial or other spreadsheet or work paper) is not created or maintained in Microsoft Excel format, convert the document to Microsoft Excel format or provide the document in a format that enables or permits functionality like or similar to Microsoft Excel (including without limitation the functionality of working cells and formulas), or provide the software program(s) that will enable the Consumer Advocate to audit and analyze the data and information in the same manner as would be enabled or permitted if the document were provided in Microsoft Excel format.

4. **Objections.** If any objections to this discovery are raised on the basis of privilege or immunity, include in your response a complete explanation concerning the privilege or immunity asserted. If you claim a document is privileged, identify the document, and state the basis for the privilege or immunity asserted. If you contend that you are entitled to refuse to fully answer any of this discovery, state the exact legal basis for each such refusal.

5. **Singular/Plural.** The singular shall include the plural, and vice-versa, where appropriate.

6. **Definitions.** As used in this Request:

(a) “You,” “Your,” “Company,” or “CGC” shall mean Chattanooga Gas Company and all employees, agents, attorneys, representatives, or any other person acting or purporting to act on its behalf.

(b) “Affiliate” shall mean any entity who, directly or indirectly, is in control of, is controlled by, or is under common control with the Company. For greater clarification, “control” is the ownership of 20% or more of the shares of stock entitled to vote for the election of directors in the case of a corporation, or 20% or more of the equity interest in the case of any other type of entity, or status as a director or officer of a corporation or limited liability company, or status as a partner of a partnership, or status as an owner of a sole proprietorship, or any other arrangement whereby a person has the power to choose, direct, or manage the board of directors or equivalent governing body, officers, managers, employees, proxies, or agents of another person. In addition, the term “Affiliate” shall mean any entity that directly or indirectly provides management or operational services to the Company or any affiliate (as defined in the preceding sentence) of the Company, or to which the Company provides management or operational services. Further, the payment of money to the Company or receipt by the Company of money from an entity with which the Company has any relationship, other than such payment or receipt, shall include the payor or recipient of such money as an “Affiliate”.

(c) “Communication” shall mean any transmission of information by oral, graphic, written, pictorial or otherwise perceptible means, including but not limited to personal conversations, telephone conversations, letters, memoranda, telegrams, electronic mail, newsletters, recorded or handwritten messages, meetings, and personal conversations, or otherwise.

(d) “Document” shall have the broadest possible meaning under applicable law. “Document” shall mean any medium upon which intelligence or information can be recorded or retrieved, such as any written, printed, typed, drawn, filmed, taped, or recorded medium in any manner, however produced or reproduced, including but not limited to any writing, drawing, graph, chart, form, letter, note, report, electronic mail, memorandum (including memoranda, electronic mail, report, or note of a meeting or communication), work paper, spreadsheet, photograph, videotape, audio tape, computer disk or record, or any other data compilation in any form without limitation, which is in your possession, custody or control. If any such document was, but no longer is, in your possession, custody or control, state what disposition was made of the document and when it was made?

(e) “Person” shall mean any natural person, corporation, firm, company, proprietorship, partnership, business, unincorporated association, or other business or legal entity of any sort whatsoever.

(f) “Identify” with respect to:

- i. Any natural person, means to state the full name, telephone number, email address and the current or last known business address of the person (if no business address or email address is available provide any address known to you) and that person's relationship, whether business, commercial, professional, or personal with you;
 - ii. Any legal person, business entity or association, means to state the full name, the name of your contact person with the entity, all trade name(s), doing business as name(s), telephone number(s), email address(es), and current or last known business address of such person or entity (if no business address is available provide any address known to you);
 - iii. Any document, means to state the type of document (e.g., letter), the title, identify the author, the subject matter, the date the document bears and the date it was written; and
 - iv. Any oral communication means to state the date when and the place where it was made, identify the person who made it, identify the person or persons who were present or who heard it, and the substance of it.
- (g) "And" and "or" shall be construed conjunctively or disjunctively as necessary to make the discovery request inclusive rather than exclusive.
- (h) "Including" shall be construed to mean including but not limited to.

FIRST SET OF DISCOVERY REQUESTS

1-1. Provide a copy of CGC's 2023 Tennessee State Excise Tax Return.

RESPONSE:

1-2. Provide a copy of CGC's 2023 Federal Income Tax Return (as calculated).

RESPONSE:

1-3. Confirm or deny that the Southern Company, or an affiliate of the Southern Company made a \$100,000 contribution to the Trump Inauguration Fund (or similarly named organization).

If confirmed, please respond to the following:

- a. Identify the date of the contribution; and

- b. If any portion of this expenditure were allocated to CGC, identify the date of the recorded transaction, the account, and the amount charged on the books of the company.

RESPONSE:

1-4. Regarding the Company's Franchise tax obligation respond to the following:

- a. Describe the implications of the repeal of the property measure of the Franchise Tax; and
- b. Is the Company eligible for Franchise Tax refunds for prior years? If so, provide the following:
 - i. Status of the refund request;
 - ii. How such refunds were accounted for in 2024; and
 - iii. The date and amount of any recordings to Franchise Tax Expense in 2024 or 2025 to date.

RESPONSE:

1-5. Provide a listing of vehicles included within CGC assets in this case, including the vintage, make, and model of the vehicle.

RESPONSE:

1-6. Provide a copy of the consultant's report on implementing the Natural Gas Safe Harbor rules. Provide the underlying calculations of amounts applicable to CGC.

RESPONSE:

1-7. Provide a copy of the return to provision accounting adjustments made on the books of CGC to reconcile its financial statements to its 2023 state and federal tax filings (or the CGC portion of the Southern Company Gas federal tax filing).

RESPONSE:

- 1-8.** Provide a file that identifies the recipients of all dues and memberships charged to CGC whether directly assigned or allocated. The file should also specify the amount charged to CGC, the month, and the account charged.

RESPONSE:

- 1-9.** Provide a file that identifies the recipients of all outside services charged to CGC whether directly assigned or allocated. The file should also specify the amount charged to CGC, the month, and the account charged.

RESPONSE:

- 1-10.** Confirm that the Diversity, Equity, and Inclusion departmental costs incorporated into the current ARM filing is \$6,958 (extrapolated from Schedule 19.3). If this is not confirmed, identify the correct amount.

RESPONSE:

- 1-11.** Provide the average cost of newly installed Main by mile for 2024, split between New Business and Replacement.

RESPONSE:

- 1-12.** Provide the average cost of service lines installed by year for 2024 split between New Business and Replacement.

RESPONSE:

- 1-13.** Identify the number of line locates occurring within the CGC service territory by year for 2020 – 2024.

RESPONSE:

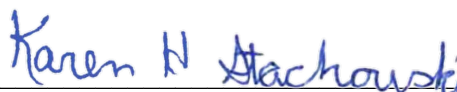
- 1-14.** Notwithstanding the significant growth in the CGC footprint, identify the metrics used to measure the progress in mitigating damage to the Company's system. Provide those annual metrics for the period 2020 – 2024.

RESPONSE:

- 1-15.** Refer to Schedule 19.3 and respond to the following regarding cost assignments:
- a. The total Operating Expenses allocated from AGL, Department 1322 Asset Protection – AGLC was \$19,283 in 2024. Provide a description of the services provided, including how CGC benefited from these services; and
 - b. Operating Expenses associated with Department ASC 1343 EVP Nicor Gas totaled \$7,550 during 2024, with charges primarily incurred in the months of June, September and December. Provide a description of the nature of the charges incurred that gave rise to these allocated charges in these months and provide any supporting documentation documenting the gross charges before allocation to CGC.

RESPONSE:

RESPECTFULLY SUBMITTED,



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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served via electronic mail, and by request via US Mail, upon:

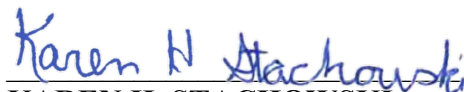
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This the 5th day of May, 2025.



KAREN H. STACHOWSKI

Deputy Attorney General