

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

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

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**DIRECT TESTIMONY**

**OF**

**CLARK D. KAML**

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**June 16, 2025**

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1   **Q3.    HAVE YOU PREVIOUSLY PROVIDED TESTIMONY BEFORE THE**  
2           **TENNESSEE PUBLIC UTILITY COMMISSION (“TPUC” OR THE**  
3           **“COMMISSION”)?**

4   A3.    Yes. I filed testimony in the Tennessee-American Water Company’s recent rate  
5           case, TPUC Docket No. 24-00032 and the Limestone Water Utility Operating  
6           Company’s recent rate case, TPUC Docket No. 24-00044.

7   **Q4.    ON WHOSE BEHALF ARE YOU TESTIFYING?**

8   A4.    I am testifying on behalf of the Consumer Advocate Division.

9   **Q5.    WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

10   A5.   My testimony will discuss the Consumer Advocate’s review and recommendations  
11           with respect to the Annual Petition filed by Chattanooga Gas Company (“CGC” or  
12           the “Company”) to adjust its rates and charges. Specifically, I have reviewed and  
13           will provide recommendations regarding:

- 14           a. Revenue;
- 15           b. Rate Base; and
- 16           c. Rate Design.

17   **Q6.    WHAT DOCUMENTS HAVE YOU REVIEWED IN PREPARATION OF**  
18           **YOUR TESTIMONY?**

19   A6.    I have reviewed the Company’s Pre-Filed Testimony along with the exhibits and  
20           workpapers filed with the Company’s Petition. Additionally, I have reviewed the  
21           Company’s discovery responses to the Consumer Advocate’s discovery requests  
22           issued and filed in this Docket.

1                   **II. EXECUTIVE SUMMARY AND RECOMMENDATIONS**

2   **Q7. WHAT ARE YOUR RECOMMENDATIONS?**

3   A7. First, I would like to note that this Petition is CGC's sixth Annual Review  
4       Mechanism ("ARM") filing. My recommendations and findings regarding the  
5       Company's ARM filing include the following:

- 6           • The current proposed increase includes a \$1,977,776 carryover from  
7           CGC's 2024 ARM filing, in TPUC Docket No. 24-00024.
- 8           • The \$6,800,000 rate cap on the annual increase expired and does not  
9           apply to this Petition.
- 10          • That the Commission takes note of the change in the rate class  
11          percentage of contribution to total revenue.

12                   **III. CGC ARM PROPOSAL AND RESULTS**

13   **Q8. CAN YOU PROVIDE A BRIEF DISCUSSION OF THE OVERALL**  
14       **PURPOSE OF THE ARM?**

15   A8. In general, an alternative ratemaking mechanism is intended to provide a more  
16       streamlined option to traditional cost of service ratemaking processes while  
17       meeting traditional regulatory objectives of just and reasonable rates. Some general  
18       thoughts are that an alternative ratemaking mechanism can be less burdensome and  
19       costly than traditional rate regulation and enable a company to be more responsive  
20       to changing goals and needs of the company and community.

21   **Q9. HOW DOES CGC's ARM MEET THE GOALS OF BEING LESS**  
22       **BURDENSOME AND COSTLY?**

23   A9. The ARM design used by CGC was agreed to in a stipulation and settlement among  
24       the Consumer Advocate, the Company, Commission Staff as a Party, and the  
25       Chattanooga Regional Manufacturers' Association in TPUC Docket No. 19-

00047.<sup>1</sup> As designed, the ARM allows the Company to annually adjust its revenue requirement and revenue recovery, subject to certain formulas and criteria, outside of a traditional rate case proceeding.

**Q10. HOW MUCH OF A RATE ADJUSTMENT IS THE COMPANY REQUESTING IN THIS DOCKET?**

A10. In the instant Petition, the Company has requested a revenue adjustment of \$3,976,804.<sup>2</sup>

**Q11. HOW IS THE COMPANY'S \$3,976,804 RATE ADJUSTMENT CALCULATED?**

A11. The Company's proposed rate adjustment calculation is presented in CGC's File2025-04-18 CGC Weems Exhibit TW-1.xlsx>, Schedule 1 and reproduced below in Table 1 below. Table 1 demonstrates that for 2024, CGC had an earned return of 4.77 percent, representing a revenue deficiency of \$9,727,452. After normalizing the 2024 period, CGC's earned return is 8.70 percent. The net results in an annual true up revenue requirement of \$3,976,804.<sup>3</sup> See Table 1 below:

[Intentionally Blank, Table on Next Page]

<sup>1</sup> *Stipulation and Settlement Agreement by and Among Chattanooga Gas Company, the Consumer Advocate Unit of the Attorney General, the Chattanooga Regional Manufacturer's Association, and Party Staff*, TPUC Docket No. 19-00047 (July 26, 2019).

<sup>2</sup> *Direct Testimony of Tiffani Weems* at 2:11-13.

<sup>3</sup> *Id.* at Exhibit TW-1, Schedule 1, ln 16 (pdf p. 16 of 455).

Table 1 – Revenue Deficiency Calculation					
Description	Adopted Docket 18-00017	Prior Year Adopted Docket 24-00024	Historic Base Period with Rate Making Adjustments	Historic Base Period Normalized	Annual True- Up Revenue Requirement Rate Adjustment
Rate Base	\$149,739,716	\$275,722,898	\$308,037,896	\$301,885,463	\$305,624,279
Operating Income	\$9,625,826	\$13,109,135	\$14,704,247	\$26,256,370	\$18,801,145
Earned Return	6.43%	4.75%	4.77%	8.70%	6.15%
Fair Rate of Return	7.12%	7.12%	7.12%	7.12%	7.12%
Required Operating Income	\$10,657,876	\$19,624,856	\$21,924,908	\$21,487,003	\$21,753,117
Operating Income Deficiency	\$1,032,050	\$6,515,720	\$7,220,662	-\$4,769,367	\$2,951,971
Gross Revenue Conversion Factor	1.347169	1.347169	1.347169	1.347169	1.347169
Revenue Deficiency	\$1,390,345	\$8,777,776	\$9,727,452	-\$6,425,143	\$3,976,804

**Q12. IS THE CALCULATION CONSISTENT WITH THE METHOD UTILIZED IN PREVIOUS FILINGS?**

A12. Yes. The formula in Table 1 above is the same formula used in the previous ARM filings and is calculated in accordance with the methodologies and terms from the Commission Order in TPUC Docket No. 19-00047.<sup>4</sup>

**Q13. HOW DOES THE REQUEST IN THIS PROCEEDING COMPARE WITH THE REQUEST IN PREVIOUS DOCKETS?**

A13. Table 2 below is a summary of the current ARM proposal along with the revenue deficiency calculations in previous filings:

Table 2 – Prior ARM Approvals			
Docket Number	Approved Increase	Rate Cap	Carry Over
20-00049	\$4,758,576		
21-00048	\$11,545,439	\$6,800,000	\$4,745,439
22-00032	\$7,911,764	\$6,800,000	\$1,111,764
23-00029	\$11,936,563	\$6,800,000	\$5,136,563
24-00024	\$8,777,776	\$6,800,000	\$1,977,776

<sup>4</sup> Order Approving Settlement Agreement, In re: Petition of Chattanooga Gas Company to Opt into an Annual Review of Rates Mechanism Pursuant to § 65-5-103(d)(6), TPUC Docket No. 19-00047 (October 7, 2019).

1   **Q14. IN PREVIOUS YEARS, DID THE RATE INCREASES MATCH THE**  
2       **DEFICIENCIES?**

3   A14. They did not. As part of its April 20, 2021, filing in TPUC Docket No. 21-00048,  
4       CGC offered to “voluntarily and temporarily limit the total rate increase for any  
5       year over the next four years to a maximum amount of \$6.8 million.”<sup>5</sup> The revenue  
6       deficiencies in each of the last four years exceeded the cap, the differences are  
7       identified in the above Table 1 above in the column titled Carry Over.

8   **Q15. WILL THE RATE INCREASE FOR THIS DOCKET BE SUBJECT TO THE**  
9       **SAME RATE INCREASE CAP?**

10   A15. No. The rates in this Docket are not subject to the cap. Last year’s 2024 docket,  
11       reviewing 2023 revenue requirements, was the fourth and last year subject to the  
12       voluntary rate cap. The number of years that the rate cap was in effect does not  
13       coincide with ARM sequence because the rate cap was approved the year after  
14       CGC’s ARM mechanism was approved.

15   **Q16. HOW WERE THE DIFFERENCES BETWEEN THE APPROVED**  
16       **INCREASES AND THE RATE CAP TREATED?**

17   A16. The amount over \$6.8 million was carried over to the next year. This Petition  
18       includes the carryover of \$1,977,776 from the ARM docket in 2024.

19   **Q17. IS THERE A CARRYING COST ASSOICATED WITH THE**  
20       **DEFICIENCY?**

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<sup>5</sup>       *Order Approving Settlement Agreement on Chattanooga Gas Company’s 2020 Annual Rate Review Filing Pursuant to Tenn. Code Ann. § 65-5-103(d)(6)*, p. 14, TPUC Docket No. 21-00048 (November 1, 2021).



1 A17. Yes. The Direct Testimony of Tiffani Weems noted that with the carrying cost, the  
2 total deficiency balance is \$10,123,374.<sup>6</sup> The final deficiency balance implies a  
3 carrying cost of \$395,922 (\$10,123,374 - \$9,727,452).<sup>7</sup>

4 **Q18. DO YOU HAVE ANY COMMENTS REGARDING THE CARRYING**  
5 **COSTS?**

6 A18. The actual carrying cost is unclear. Schedule 1 in Exhibit TW-1, CGC indicates a  
7 Revenue Deficiency of \$9,727,452 without carrying costs.<sup>8</sup> As noted above, the  
8 implied carrying cost is \$395,922. The carrying cost is directly computed on  
9 Schedule 29 in Exhibit TW-1 and reproduced below on Table 3. As demonstrated  
10 in Table 3, before accounting for taxes, the carrying charge is \$256,969.<sup>9</sup> The  
11 product of applying the Tax Gross Up Factor to the carrying cost is \$347,890 while  
12 the implied carrying cost using Schedule 1 is \$395,923, a difference of \$48,033.

Table 3 -Carrying Cost			
Description	Historic Base Period with Rate Making Adjustments	Schedule 29 Carrying Charge Calculation	
Operating Income Deficiency (Excess)	\$ 7,220,662	\$ 7,220,662	a/
Carrying Charge		\$ 256,969	b/
Historic Period Earnings Deficiency Plus Carrying Charges		\$ 7,477,631	c/
Gross Revenue Conversion Factor	1.347168975		
Revenue Deficiency w/o carrying cost, Schedule 1	\$ 9,727,452		
Tax Gross Up Factor		1.35382116	
Revenue Deficiency with carrying	\$ 10,123,375	\$ 10,123,375	
Implied Carrying Cost	\$ 395,923		
Carrying Multiplied by Tax Gross Up Factor		\$ 347,890	
Carrying Cost Variance	\$ 48,033		
a/ Schedule 29, ln 30			
b/ Schedule 29, ln 35			
c/ Schedule 29, ln 36			

13

6 *Direct Testimony of Tiffani Weems* at 10:1-2.

7 *Id.* at 9:22 – 10:2.

8 *Id.* at Exhibit 1, Schedule 1, ln 16 (pdf p. 16 of 455).

9 *Id.* at Exhibit 1, Schedule 29 (pdf p. 448 of 455).

1 **Q19. IS THERE AN EXPLANATION FOR THE DIFFERENCE IN THE**  
2 **CARRYING COST CALCUATIONS?**

3 A19. Yes. The revenue conversion applied in Schedule 1 includes Forfeited Discounts  
4 (Late Payments) and an Uncollectable adjustment, produces gross revenue  
5 conversion factor (1.347168975)<sup>10</sup> that is slightly less than the Tax Gross up Factor  
6 (1.35382116).<sup>11</sup> Therefore, it appears that the revenue deficiency from Schedule 1  
7 may be understated by \$48,033.

8 **Q20. DOES THE DIFFERENCE IN CARRYING COST IMPACT THE FINAL**  
9 **REVENUE DIFICIENCY?**

10 A20. It does not. The ARM is self-correcting. In each filing, the historic base year has  
11 rate making adjustments to account for deficiencies or overages. In addition, CGC  
12 followed the ARM calculations from TPUC Docket No. 19-00047, thus, there is no  
13 adjustment to be made.

14 **Q21. HAVE YOU REVIEWED THE CALCULATIONS SUPPORTING THE**  
15 **ARM FILING?**

16 A21. Yes, I have.

17 **Q22. WHAT WERE THE RESULTS OF YOUR REVIEW?**

18 A22. The primary driver for the revenue requirement change is the Rate Base increase of  
19 \$29.9 million. The Rate Base change results in a \$2.128 million increase required  
20 operating income and contributed \$3.56 million to the deficiency.

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<sup>10</sup> *Direct Testimony of Tiffani Weems.* at Exhibit 1, Schedule 1, ln 14, col C (pdf p. 16 of 455) and Schedule 12, ln 20 (pdf p. 40 of 455).

<sup>11</sup> *Id.* at Exhibit 1, Schedule 29, ln 37 (pdf p. 448 of 455).

Overall, the Company's filing reflected the actual revenues, expenses, and net investments recorded on the Company's books and ledgers.

Table 4-Revenue Deficiency Comparision	
Description	CGC ARM Filing
Rate Base	\$ 305,624,279
Operating Income	\$ 18,801,145
Earned Return	6.15%
Fair Rate of Return	7.12%
Required Operating Income	\$ 21,753,117
Operating Income Deficiency (Excess)	\$ 2,951,971
Gross Revenue Conversion Factor	1.347168975
Revenue Deficiency (Surplus)	\$ 3,976,804

Consumer Advocate witness David Dittmore has proposed certain adjustments to CGC's expenses and rate base. At the time of this testimony, the net operating loss adjustment is not completed. Once the adjustment is known, it will be incorporated into a revenue requirement schedule and presented to the Commission.

#### **IV. CONSUMER ADVOCATE'S PROPOSED RATE DESIGN FOR THE ARM REVENUE DEFICIENCY**

##### **Q23. WHAT IS THE PROPOSED RATE INCREASE?**

A23. The total proposed rate increase is \$3,976,804.<sup>12</sup> This is approximately a 5.9 percent<sup>13</sup> rate increase.

##### **Q24. HOW HAS THE COMPANY PROPOSED TO ALLOCATE AND RECOVER THE \$3,976,804 REVENUE DEFICIENCY TO THE VARIOUS CUSTOMER CLASSES?**

A24. For customers taking service at tariff rates, CGC is proposing to increase rates to

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<sup>12</sup> Direct Testimony of Ashley Vette at 2:19.

<sup>13</sup> Id. at 3:16-17.

1 each Rate Schedule on an equal percentage.<sup>14</sup> The Company has two customers  
2 with Commission-approved Special Contracts; Kordsa, Inc, and Volkswagen  
3 (“VW”). For these customers, CGC proposes rates based on the contracts with  
4 those customers. The Kordsa, Inc. contract limits the rate increase to 5 percent.<sup>15</sup>  
5 CGC stated that the Special Contract with Volkswagen was part of a package of  
6 incentives offered by the State of Tennessee and local government officials to have  
7 VW relocate to Tennessee. The Company is proposing no rate increase for VW.<sup>16</sup>

8 **Q25. DO THE PROPOSED RATE ALLOCATIONS TO THE CONTRACT**  
9 **CUSTOMERS AFFECT OTHER CUSTOMERS?**

10 A25. The five percent limit on any increase in Kordsa, Inc. rates reduce the allocation by  
11 \$1,579. This represents approximately 0.039 percent of the total revenue increase.

12 **Q26. WHAT IS THE PROPOSED RATE INCREASE TO TARIFFED RATES?**

13 A26. Ms. Vette noted in her testimony that the tariff rates will increase approximately  
14 5.9 percent.<sup>17</sup> The specific impacts are calculated in Exhibit TW-1, Schedule 17.1.  
15 The Company’s proposed allocation of the revenue deficiency is presented below  
16 in Table 5:

17 *[Intentionally Blank, Table on Next Page]*  
18

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14 *Id.* at 2:21-23.

15 *Direct Testimony of Ashley Vette* at 3:1-3.

16 *Id.* at 3-7.

17 *Id.* at 3:16-17.

<b>Table 5 - Company Proposed Revenue Allocation</b>				
<b>Rate Schedule</b>	<b>Normalized Revenue</b>	<b>Percent Increase</b>	<b>Revenue Increase</b>	<b>Normalized Revenue Plus Increase</b>
Residential (R-1)	\$30,825,936	5.90%	\$1,818,577	\$32,644,513
Multi-Family (R-4)	\$55,322	5.90%	\$3,264	\$58,586
Commercial (C-1)	\$6,959,736	5.90%	\$410,590	\$7,370,326
Commercial (C-2)	\$17,797,820	5.90%	\$1,049,983	\$18,847,802
Industrial (F-1/T-2)	\$5,175,422	5.90%	\$305,324	\$5,480,746
Industrial (I-1)	\$0	5.90%	\$0	\$0
Industrial (T-1)	\$1,966,886	5.90%	\$116,037	\$2,082,923
Industrial (F-1/T-2/T-1)	\$2,582,833	5.90%	\$152,374	\$2,735,207
Industrial (T-3)	\$1,896,511	5.90%	\$111,885	\$2,008,396
Contract-VW		0.00%	\$0	\$0
Contract-Kordsa	\$175,434	5.00%	\$8,772	\$184,206
<b>Total</b>	<b>\$67,435,901</b>	<b>5.90%</b>	<b>\$3,976,804</b>	<b>\$71,412,705</b>

1

2 **Q27. WHAT IS THE IMPACT ON RESIDENTIAL CUSTOMERS?**

3 A27. CGC proposed the following rate changes:<sup>18</sup>

	Current		Proposed	
	Winter	Summer	Winter	Summer
Customer Charge	\$32.50	\$26.80	\$34.40	\$28.40
Volumetric Rate/Therm	\$0.22429		\$0.23750	

4

5 Ms. Vette stated in her testimony that the proposed rates will result in an average  
6 monthly bill increase of \$2.43.<sup>19</sup>

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<sup>18</sup> Direct Testimony of Ashley Vette at 4:1.

<sup>19</sup> Id.

**V. REVENUE ALLOCATION AND RATE DESIGN**

**Q28. HAVE YOU COMPARED THE REVENUE RECOVERY ALLOCATION RESULTING FROM THIS FILING WITH THOSE IN THE ORIGINAL ARM FILING?**

A28. Yes. The rate design and revenue contribution by class was reviewed from TPUC Docket No. 18-00017 to the current proposal.<sup>20</sup>

**Q29. HAS THE PERCENTAGE OF REVENUE CONTRIBUTION BY CUSTOMER CLASS REMAINED CONSISTANT IN THE ARM FILLINGS?**

A29. Generally, yes. As demonstrated in Table 6 below, there have been some changes in the percentage of revenue contributed by rate classes:

Table 6 - Percent of Revenue by Class								
Rate Schedule	Revenue Per Rate Schedule Docket 18-00017	% of Total by Rate Schedule	Normalized Revenue Plus Increase	% of Total by Rate Schedule	% of Revenue Drift	Revenue Represented by Drift	Absolute Value of Drift	Percent Change of the Revenue Allocation by Class
Residential (R-1)	\$14,746,291.99	44.8%	\$32,644,513	45.7%	0.9%	\$647,444	\$647,444	1.98%
Multi-Family (R-4)	\$28,579.00	0.1%	\$58,586	0.1%	0.0%	(\$3,426)	\$3,426	-5.85%
Commercial (C-1)	\$3,648,000.60	11.1%	\$7,370,326	10.3%	-0.8%	(\$545,245)	\$545,245	-7.40%
Commercial (C-2)	\$8,592,932.76	26.1%	\$18,847,802	26.4%	0.3%	\$202,528	\$202,528	1.07%
Industrial (F-1/T-2)	\$2,114,123.66	6.4%	\$5,480,746	7.7%	1.3%	\$893,440	\$893,440	16.30%
Industrial (I-1)	\$36,273.94	0.1%	\$0	0.0%	-0.1%	(\$78,709)	\$78,709	
Industrial (T-1)	\$1,082,153.11	3.3%	\$2,082,923	2.9%	-0.4%	(\$265,174)	\$265,174	-12.73%
Industrial (F-1/T-2/T-1)	\$1,333,341.87	4.1%	\$2,735,207	3.8%	-0.2%	(\$157,929)	\$157,929	-5.77%
Industrial (T-3)	\$1,329,836.64	4.0%	\$2,008,396	2.8%	-1.2%	(\$877,134)	\$877,134	-43.67%
Special Contract			\$184,206	0.3%	0.3%	\$184,206	\$184,206	
<b>Total Revenue</b>	<b>\$32,911,533.58</b>	<b>100.0%</b>	<b>\$71,412,705</b>	<b>100.0%</b>			<b>\$3,855,236</b>	

**Q30. ARE THERE ANY CHANGES THAT STAND OUT?**

A30. There are a few deviations that are interesting. Of the classes contributing to

<sup>20</sup> Amended Order, In re: Petition of Chattanooga Gas Company for Approval of an Adjustment in Rates and Tariff, the Termination of the AUA Mechanism and the Related Tariff Changes and Revenue Deficiency Recovery; and an Annual Rate Review Mechanism, TPUC Docket No. 18-00017 (January 15, 2019).

1 revenue in TPUC Docket No. 18-00017,<sup>21</sup> and still contributing revenue, four of  
2 them have had their percentage of contribution to the total revenue change by 0.8  
3 to 1.3 percent. As a percentage of total revenue, the numbers may not appear  
4 significant. However, the rate change for the customer looks a little different.

5 **Q31. HAVE THE CHANGES IN RATES BY CUSTOMER CLASS BEEN**  
6 **CONSISTENT?**

7 A31. Generally, the rate changes for classes have been consistent. The increase in  
8 tariffed rates from TPUC Docket No. 18-00017<sup>22</sup> to those proposed in the instant  
9 Docket varies from 100 to 114 percent:<sup>23</sup>

- 10 • The customer charge for all classes was consistent at 1.038333  
11 percent.
- 12 • Commodity charge increases varied between 102.5836 and  
13 1.058564 percent.
- 14 • The most pronounced difference was the Demand Charge for  
15 Industrial Transport Customers (T-1), which increased 114 percent,  
16 while the demand charge for Commercial and other Industrial  
17 Customers increased 100 percent.

18 **Q32. DO YOU HAVE ANY COMMENTS REGARDING THE DIFFERENCES IN**  
19 **THE RATE INCREASES?**

20 A32. As demonstrated above, the ARM filings have the potential to change rate design  
21 over time. To the extent that rate design is being altered, unintentionally or by  
22 design, such changes should be specifically identified in the petitions.

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21 *Id.*

22 *Id.*

23 File <Exhibit CDK-1.xlsx> filed with this Testimony.

1     **Q33.   WHAT RATES DO YOU RECOMMEND?**

2     A33.   I recommend approval of the Company's proposal, as shown above in Table 5, and  
3           that in future proceedings, the Company identify the proposed rate changes to each  
4           specific rate and the percentage of impact that it will have on the customer classes.

5     **Q34.   DOES THIS COMPLETE YOUR TESTIMONY?**

6     A34.   Yes.   However, I reserve the right to incorporate any new information that may  
7           subsequently become available.



IN THE TENNESSEE PUBLIC UTILITY COMMISSION  
AT NASHVILLE, TENNESSEE

IN RE:

CHATTANOOGA GAS COMPANY'S  
PETITION FOR APPROVAL OF ITS  
2024 ANNUAL RATE REVIEW FILING  
PURSUANT TO TENN. CODE ANN. §  
65-5-103(d)(6)

DOCKET NO. 25-00028

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AFFIDAVIT

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I, Clark Kaml, on behalf of the Consumer Advocate Division of the Attorney General's Office, hereby certify that the attached Direct Testimony represents my opinion in the above-referenced case and the opinion of the Consumer Advocate Division.

Clark D. Kaml  
CLARK D. KAML

Sworn to and subscribed before me  
this 16th day of June, 2025.

Terra Allen  
NOTARY PUBLIC



My commission expires: 1/31/2027

Exhibit CDK-1

Rate Change From Docket 18-00017 to Current Proposal				
		Docket		
		18-00017	25-00028	Change
<b>Rate Schedule</b>				
<b>Residential (R-1)</b>	Winter	\$14.00	\$28.40	102.86%
<b>Residential (R-1)</b>	Summer	\$17.00	\$34.40	102.35%
<b>Residential (R-1)</b>	Commodity	\$0.11591	\$0.23750	104.90%
<b>Multi-Family (R-4)</b>	Customer Charge	\$6.25	\$12.60	101.60%
<b>Multi-Family (R-4)</b>	Commodity Winter	\$0.21768	\$0.44370	103.83%
<b>Multi-Family (R-4)</b>	Commodity Summer	\$0.19350	\$0.39441	103.83%
<b>Multi-Family (R-4)</b>	AC	\$0.03948	\$0.07998	102.58%
<b>Commercial (C-1)</b>	Winter	\$31.00	\$63.40	104.52%
<b>Commercial (C-1)</b>	Summer	\$26.00	\$54.80	110.77%
	Commodity Winter	\$0.185810	\$0.378090	103.48%
	Commodity Summer	\$0.145890	\$0.296780	103.43%
	AC	\$0.039480	\$0.079980	102.58%
<b>Commercial (C-2)</b>	Customer Charge	\$75.00000	\$152.90	103.87%
	First 3,000 Therms			
	Winter	\$0.187440	\$0.384380	105.07%
	Summer	\$0.147170	\$0.302000	105.20%
	Next 2,000 Therms			
	Winter	\$0.171090	\$0.350980	105.14%
	Summer	\$0.116830	\$0.240080	105.50%
	Over 10,000 Therms			
	Winter	\$0.166660	\$0.341920	105.16%
	Summer	\$0.108920	\$0.223890	105.55%
	Over 15,000 Therms			
	Winter	\$0.086230	\$0.177510	105.86%
	Summer	\$0.086230	\$0.177480	105.82%
	Demand Charge/Dth	\$6.35	\$12.70	100.00%
	AC	\$0.039480	\$0.079980	102.58%
<b>Industrial (F-I/T-2)</b>	Customer Charge	\$300.00	\$611.50	103.83%
	Demand Charge/Dth	\$6.35	\$12.70	100.00%
	Commodity Charge			
	First 1,500 Dths Month	\$0.80640	\$1.64850	104.43%
	Next 2,500 Dths Month	\$0.68910	\$1.40077	103.28%
	Next 11,000 Dths Month	\$0.39080	\$0.79980	104.66%
	Over 15,000 Dths Month	\$0.24020	\$0.49380	105.58%
<b>Industrial (I-1)</b>	Customer Charge	\$300.00	\$611.50	103.83%
	Commodity Charge			
	First 1,500 Dths Month	\$0.80640	\$1.64850	104.43%
	Next 2,500 Dths Month	\$0.68910	\$1.40077	103.28%
	Next 11,000 Dths Month	\$0.39080	\$0.79980	104.66%
	Over 15,000 Dths Month	\$0.24020	\$0.49380	105.58%
<b>Industrial (T-1)</b>	Customer Charge	\$300.00	\$611.50	103.83%
	Demand Charge/Dth	\$1.35	\$2.90	114.81%
	Commodity Charge			
	First 1,500 Dths Month	\$0.80640	\$1.64850	104.43%
	Next 2,500 Dths Month	\$0.68910	\$1.40077	103.28%
	Next 11,000 Dths Month	\$0.39080	\$0.79980	104.66%
	Next 15,000 Dths Month	\$0.24020	\$0.49380	105.58%
<b>Industrial (T-3)</b>	Customer Charge Winter	\$75.00	\$152.90	103.87%
	Demand Charge/DTH	\$6.35	\$12.70	100.00%
	Commodity Charge Winter			
	First 1,500 Dths Month	\$0.18744	\$0.38438	105.07%
	Next 2,500 Dths Month	\$0.17109	\$0.35098	105.14%
	Next 11,000 Dths Month	\$0.16666	\$0.34192	105.16%
	Next 15,000 Dths Month	\$0.08623	\$0.17751	105.86%
	Commodity Charge Summer			
	First 1,500 Dths Month	\$0.14717	\$0.30208	105.26%
	Next 2,500 Dths Month	\$0.11683	\$0.24008	105.50%
	Next 11,000 Dths Month	\$0.10892	\$0.22389	105.55%
	Next 15,000 Dths Month	\$0.08623	\$0.17748	105.82%

18-00017 Chattanooga Gas Revised tariff sheets filed 10/22/2018.

25-00038 Values: Vett Exhibit AV-1