

**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**

**DAVID N. DITTEMORE**

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**June 16, 2025**

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1 I. INTRODUCTION

2 Q1. PLEASE STATE YOUR NAME AND OCCUPATION FOR THE RECORD.

3 A1. My name is David N. Dittmore. I am a self-employed consultant working in the utility  
4 regulatory sector.

5 Q2. PLEASE PROVIDE A SUMMARY OF YOUR BACKGROUND AND  
6 PROFESSIONAL EXPERIENCE.

7 A2. I received a Bachelor of Science in Business Administration from the University of Central  
8 Missouri in 1982. I am a Certified Public Accountant licensed in Oklahoma (#7562). I  
9 was previously employed by the Kansas Corporation Commission (“KCC”) in various  
10 capacities, including Managing Auditor, Chief Auditor, and Director of the Utilities  
11 Division. I was self-employed as a utility regulatory consultant for approximately four  
12 years. Additionally, during this time frame, I performed a consulting engagement for  
13 Kansas Gas Service (“KGS”), my subsequent employer. For eleven years, I served as  
14 Manager and subsequently Director of Regulatory Affairs for KGS, Kansas’s largest  
15 natural gas utility, serving approximately 625,000 customers. KGS is a division of One  
16 Gas, a natural gas utility serving about two million customers in Kansas, Oklahoma, and  
17 Texas. I joined the Tennessee Attorney General’s Office in September 2017 as a Financial  
18 Analyst. In July 2021, I began my consulting practice. I have presented testimony on  
19 behalf of clients in several different states.

20 I was formerly a Board Member of the Financial Research Institute (University of  
21 Missouri), a member of the NARUC Subcommittee on Accounting, the Vice-Chair of the  
22 Accounting Committee of the National Association of State of Utility Consumer Advocates

1 (“NASUCA”), and an active participant in NASUCAs’ Natural Gas and Water Committees.  
2 I have thirty years of experience in public utility regulation. I have presented testimony as  
3 an expert witness on many occasions. Attached as Exhibit DND-1 is a detailed overview  
4 of my background.

5 **Q3. HAVE YOU PREVIOUSLY PROVIDED TESTIMONY BEFORE THE**  
6 **TENNESSEE PUBLIC UTILITY COMMISSION (“TPUC” OR THE**  
7 **“COMMISSION”)?**

8 A3. Yes. I have provided testimony before the Commission on many occasions. Attached as  
9 Exhibit DND-2 is a listing of regulatory matters in which I’ve provided testimony for the  
10 period 2015 – current.

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

12 A4. I am testifying on behalf of the Consumer Advocate Division of the Tennessee Attorney  
13 General’s Office (the “Consumer Advocate”).

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

15 A5. My testimony will discuss the Consumer Advocate’s recommendations regarding the  
16 recovery of O&M cost income taxes and accumulated deferred income taxes (“ADIT”) within the Rate Base. The revenue requirement recommendation has not been completed  
17 as of the preparation of this testimony, since one of the adjustments has yet to be computed.  
18 The parties are in agreement regarding the need for this adjustment; however, the  
19 computation is complex and requires a review by Chattanooga Gas Company (“CGC”) of  
20 its historical records. The adjustment will be quantified, and a revenue requirement will  
21 be determined and supplied to the Commission as soon as possible.  
22

1 **Q6. WHAT DOCUMENTS HAVE YOU REVIEWED IN PREPARATION FOR YOUR**  
2 **TESTIMONY?**

3 A6. I have reviewed the Company's Pre-Filed Testimony along with the exhibits and  
4 workpapers filed with the Company's Petition. Additionally, I have reviewed the  
5 Company's discovery responses to the Consumer Advocate's discovery requests issued and  
6 filed in this Docket.

7 **II. EXECUTIVE SUMMARY AND RECOMMENDATIONS**

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

9 A7. I support four adjustments to the Company's pro forma operating and maintenance  
10 expenses ("O&M") and two adjustments to Rate Base, the latter of which both relate to the  
11 normalized balance of ADIT. The adjustments to O&M are required to eliminate  
12 unnecessary costs associated with providing natural gas service. Three of the adjustments  
13 involve the elimination of specific vendor costs deemed confidential by the Company.  
14 Therefore, a portion of my testimony is redacted. The two adjustments to Rate Base are  
15 necessary to properly identify the appropriate level of ADIT in establishing rates.

16 I also recommend that an additional schedule be supplied as part of the filing requirements  
17 in future CGC Annual Rate Mechanism ("ARM") filings.

18 The lack of discussion of a particular topic in my testimony should not be construed as  
19 acceptance or adoption of that issue.

1 **III. RATE BASE ADJUSTMENTS**

2 **Q8. TURN TO YOUR FIRST ADJUSTMENT TO RATE BASE.**

3 A8. Adjustment No. 1 reduces Rate Base by \$82,453 as outlined in Exhibit DND-3. This  
4 adjustment is necessary to eliminate the portion of the Company's ADIT balance that  
5 relates to the book/tax timing differences associated with long-term incentive  
6 compensation. These O&M costs were removed from the revenue requirement, so for  
7 consistency purposes, the ADIT asset should also be removed from Rate Base. The  
8 Company agrees with this adjustment as expressed in its response to Consumer Advocate  
9 DR No. 2-06.

10 **Q9. PLEASE EXPLAIN THE NATURE OF YOUR SECOND ADJUSTMENT TO THE**  
11 **RATE BASE.**

12 A9. The next adjustment is necessary to reflect a normalization adjustment to the Company's  
13 balance of its Net Operating Loss ("NOL") asset included in Rate Base. This adjustment  
14 has not been quantified at this point, and thus, there is no referenced Exhibit detailing the  
15 calculation.

16 **Q10. WHAT IS AN NOL, AND WHAT IS THE COMPANY'S RATIONALE FOR**  
17 **INCLUSION AND RATE BASE?**

18 A10. A NOL represents cumulative tax losses that may be carried forward and used in the future  
19 to offset future tax obligations. The Company has indicated that the NOL is driven by  
20 book/tax timing differences that are included in Rate Base as a liability. Another way to

1 think of the NOLs is that they represent tax deductions that have been recognized as an  
2 ADIT liability, but have yet to be monetized in the form of reduced tax payments.

3 **Q11. DO YOU BELIEVE A NOL SHOULD ALWAYS BE INCLUDED IN THE RATE**  
4 **BASE?**

5 A11. No. The inclusion of an NOL in Rate Base may be controversial. However, I'm not  
6 challenging the inclusion of an NOL in Rate Base in this case as a general rule. Instead, I  
7 will point out that the Company has not properly matched the balance of the NOL with the  
8 normalized adjustments made to its Current Tax Expense.

9 **Q12. HOW ARE THE NOL AND CURRENT TAX EXPENSE RELATED?**

10 A12. Current tax expense reflects the balance of taxes to be paid in a given period. If tax  
11 deductions are greater than taxable income, the current tax expense would reflect a credit.<sup>1</sup>  
12 As mentioned above, an NOL is a tax asset and reflects the cumulative, unused tax losses.  
13 There are differing rules on how NOLs may be used based on the vintage of the NOL.  
14 However, as a general rule, NOLs may be carried forward to reduce or eliminate future tax  
15 payments should they arise. NOL balances will increase with the recording of Current  
16 Income Tax Expense credits and decline with positive recordings to Current Tax Expense.

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<sup>1</sup> The Commission has typically required that taxes be normalized in establishing the Income Tax Expense component within the revenue requirement calculation. This means that instead of setting Income Tax Expense in rates based upon taxes paid, it is set based upon the composite tax rates applied to Operating Income as determined under Generally Accepted Accounting Principles (GAAP). Income Tax recovered in rates is the sum of Current Income Taxes plus Deferred Income Taxes, with the total reflected as Income Tax Expense computed on the regulatory determined Operating Income. The difference between this total Income Tax Expense and the Current Income Tax (amount to be paid) is recorded as Deferred Income Tax, under the theory that the deferred tax will become payable at some future date. However, in reality, that rarely occurs due to the availability of tax deductions such as the Repair Deduction and accelerated tax depreciation.

**Q13. CAN YOU IDENTIFY THE SCHEDULES YOU WILL BE REFERENCING IN SUPPORT OF THE NEED TO ADJUSTMENT THE COMPANY’S NOL BALANCE WITHIN ITS ADIT ACCOUNT?**

A13. Yes. The Schedules I will refer to are within File <2025-04-18 CGC Weems Exhibit TW-1.xlsx>, Tab “Schedule 9” and File <Schedule 35.07(b) – ADIT Workpaper.xlsx>, Tab “Schedule 35.07(b)”. Specifically, I will discuss the interaction between the pro-forma Current Income Tax Expense supported by the Company within Schedule 9 and the State NOL balances contained in Schedule 35.07(b).

**Q14. IDENTIFY THE RELEVANT INFORMATION WITHIN SCHEDULE 9 THAT IS PERTINENT TO THE NOL ISSUE.**

A14. I want to draw attention to Excel row 28, labeled “Excise Tax – Current.” The Historic Base period reflects a credit of (\$912,391). Next, I would point out that the State NOL balance reflected on File <Schedule 35.07(b) – ADIT Workpaper.xlsx>, Excel row 97 has grown during 2024, which is not surprising, as the growth in the NOL balance is directionally consistent with the existence of a state tax loss in 2024.

**Q15. IF THE HISTORIC BASE PERIOD TAX LOSS (EXPENSE) AND THE NOL ASSET ARE CONSISTENT WITH EACH OTHER, WHAT IS THE NATURE OF THE ISSUE YOU ARE RAISING?**

A15. The mismatch between the NOL Asset and the Current Tax Expense occurs as the Company computes its Historic Base Period (Normalized) results and its Annual True-up Revenue Requirement. For both of the calculations, the Company properly increases its Current Excise Tax Expense. For comparison purposes, the Historic Base period reflected a State



1       Excise Tax credit of \$912,391, compared with a credit of \$339,422 in the final annual true-  
2       up revenue requirement, for a net increase in Current Income Tax Expense of \$572,969.<sup>2</sup>  
3       The mismatch occurs with the absence of any change in the balance of the NOL to  
4       recognize the impact of the \$572,969 increase in Current Tax Expense. The reduction in  
5       the negative balance of the Current Tax Expense should result in an equal adjustment to  
6       reduce the balance of the NOL asset. In other words, the Current Tax Expense is  
7       normalized within the Company's revenue requirement request, but the related NOL Asset  
8       balance is based not upon a normalized value, but rather the thirteen-month historic base  
9       period average.

10   **Q16. DOES THE COMPANY AGREE CONCEPTUALLY WITH YOUR**  
11   **THEORETICAL ADJUSTMENT?**

12   A16. Yes. The Company has indicated agreement that the two related balances are not aligned.  
13       The Company, at the time of this writing, is evaluating its historic records and will present  
14       an adjustment to its rate base as soon as it completes its analysis.

15   **Q17. DO YOU HAVE A REVENUE REQUIREMENT RECOMMENDATION AT THIS**  
16   **TIME?**

17   A17. No. As of the drafting of this testimony, the adjustment to the Company's NOL has not  
18       been completed. Once the adjustment is known, it will be incorporated into a revenue  
19       requirement schedule and presented to the Commission.

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<sup>2</sup>       *Direct Testimony of Tiffani Weems, File <2025-04-18-CGC Weems Exhibit TW-1.xlsx>, Tab "Schedule 9."*

1 **IV. O&M ADJUSTMENTS**

2 **Q18. HAVE YOU QUANTIFIED THE REVENUE REQUIREMENT IMPACTS OF THE**  
3 **O&M ADJUSTMENTS YOU ARE SPONSORING?**

4 **A18.** Yes. The O&M adjustments I am sponsoring are identified on Exhibit DND-4. The total  
5 revenue requirement impact of the four adjustments is \$20,812 as shown on line 5.

6 **Q19. TURN TO YOUR FIRST O&M ADJUSTMENT AND EXPLAIN WHY THIS**  
7 **ADJUSTMENT IS NECESSARY.**

8 **A19.** O&M Adjustment No. 1 removes \$6,958 from O&M costs associated with departmental  
9 Diversity, Equity, and Inclusion costs allocated to CGC.<sup>3</sup> The Consumer Advocate finds  
10 that these costs may well serve corporate goals and initiatives but are not necessary in the  
11 provision of natural gas service. This adjustment is set forth in Exhibit DND-5.

12 **Q20. TURN TO O&M ADJUSTMENT NO. 2 AND EXPLAIN THE NATURE OF THIS**  
13 **ADJUSTMENT.**

14 **A20.** O&M Adjustment No. 2 is necessary to eliminate \$8,573 allocated to CGC in Federal  
15 Energy Regulatory Commission ("FERC") accounts 912 and 921, which should not be  
16 recovered from its customers. The vendor costs are identified in Confidential Table 1  
17 below and are reflected in Confidential Exhibit DND-6:

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

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<sup>3</sup> Company's Response to Consumer Advocate DR No. 1-10.

Public Table 1			
Source: Confidential Response to CA 1-08 Attachment A		Applicable	
		Monthly	Adjustment
	Total	Allocator (1)	Amount
		2.55%	1,608
		2.57%	51
		2.41%	181
		2.48%	144
		2.48%	2,923
		2.42%	1,343
		2.53%	910
		2.54%	244
		2.42%	703
		2.55%	468
Total	344,856		8,573
Excluded Dues	\$ 8,573		
(1) Source: CGC Schedule 23.3			

**Q21. PLEASE EXPLAIN WHY YOU BELIEVE THESE COSTS SHOULD NOT BE RECOVERED FROM CGC CUSTOMERS.**

A21. As a general matter, I do not find any of the costs incurred above necessary in the provision of natural gas service. The Company identifies its engagement with certain of these vendors in its Confidential Response to Consumer Advocate DR No. 2-19(e), identified as Confidential Exhibit DND-6.1. These organizations, their objectives, and reasons for exclusion from the revenue requirement are categorized as follows:

- [REDACTED]

4

These costs are removed in O&M Adjustment No. 4.

- [REDACTED]<sup>5</sup>
  - [REDACTED]<sup>6</sup>
  - [REDACTED]<sup>10</sup>
- and
- [REDACTED]

**Q22. DO YOU HAVE ADDITIONAL COMMENTS REGARDING THESE COSTS?**

A22. Yes. Captive customers of monopoly utilities should not be forced to incur costs associated with the promotion of any particular type of [REDACTED]. Costs incurred to [REDACTED] is the subject of O&M Adjustment No. 4) should be assigned to Southern Company shareholders.

Secondly, [REDACTED] such as the purported justification for affiliation with the [REDACTED]. If the Company's logic were followed, captive customers of electric utilities would also be required to support costs associated with the [REDACTED]. Likewise, costs related to the [REDACTED]

<sup>5</sup> The Company's CONFIDENTIAL Response to Consumer Advocate's DR No. 2-19(e)v. and Company's CONFIDENTIAL Supplemental Response to Consumer Advocate's DR No. 2-19(e)v.

<sup>6</sup> *Id.* at CA DR No. 2-19(e)viii.

<sup>7</sup> *Id.* at CA DR No. 2-19(e)iii.

<sup>8</sup> *Id.* at CA DR No. 2-19(e)vi.

<sup>9</sup> *Id.* at CA DR No. 2-19(e)i.

<sup>10</sup> *Id.* at CA DR No. 2-19(e)ii.

1 [REDACTED] should be recorded below the line. As described by the Company<sup>11</sup> these costs  
2 include collaboration with the [REDACTED] and it should be assumed that they  
3 also include [REDACTED]. It is unclear how the Company's funding is  
4 used, and how the [REDACTED]  
5 [REDACTED] are aligned with the interests of CGC ratepayers.<sup>12</sup>

6 Thirdly, costs associated with entities such as [REDACTED]  
7 [REDACTED] relate to indirect costs associated with [REDACTED]  
8 [REDACTED] it's unclear whether  
9 such [REDACTED] or simply goals  
10 established by the Company. In summary, there's no evidence suggesting these costs are  
11 necessary to the provision of natural gas service. With respect to costs incurred for [REDACTED]  
12 [REDACTED] there's a significant question regarding whether the Company's  
13 response to legislative matters is done on behalf of its shareholder interests or that of its  
14 customers. Often, the interests of shareholders and captive customers are not aligned in  
15 matters of legislation. Captive customers should not be required to incur costs designed to  
16 meet corporate goals or objectives that either support the interests of shareholders or are  
17 explicitly at odds with customers' interests. There is no evidence to support the inclusion  
18 of these costs in the Company's revenue requirement.

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<sup>11</sup> *Id.* at CA DR No. 2-19(b).

<sup>12</sup> [REDACTED]

1 In summary, the costs referenced above are not the types of costs that should be assigned  
2 to captive Tennessee customers.<sup>13</sup>

3 **Q23. NEXT TURN TO O&M ADJUSTMENT NO. 3 AND PROVIDE AN OVERVIEW OF**  
4 **THE REASON FOR THIS ADJUSTMENT.**

5 A23. O&M Adjustment No. 3 eliminates \$3,251 in undocumented dues and membership costs.  
6 This information is set forth in Confidential Exhibit DND-7. Consumer Advocate DR No.  
7 1-08 requested the recipients of all dues and memberships charged to CGC, whether  
8 directly assigned or allocated. A partial response was provided; however, the names of  
9 vendors whose charges were recorded to account 923 were omitted. A follow-up request  
10 was issued in Consumer Advocate Response DR No. 2-19(b). This response was re-created  
11 within Confidential Exhibit DND-7. Despite two opportunities to provide the requested  
12 information, approximately [REDACTED] in AGL Service Company dues and membership  
13 costs have not been associated with a particular vendor or organization. When these  
14 monthly undocumented costs are applied to the monthly CGC allocation factors contained  
15 in Schedule 23.3, the result is an adjustment to remove \$3,251 in allocated charges within  
16 account 923 from the revenue requirement. Dues and membership costs that cannot be  
17 identified with a particular vendor should not be recovered from ratepayers.

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<sup>13</sup> The burden of proof is with the Company to justify the inclusion of these costs in the revenue requirement.



1 **Q24. NOW TURN TO O&M ADJUSTMENT NO. 4 AND EXPLAIN WHY THIS**  
2 **ADJUSTMENT IS NECESSARY.**

3 A24. O&M Adjustment No. 4 removes [REDACTED] in costs allocated to CGC associated with  
4 membership dues of the [REDACTED]  
5 [REDACTED]  
6 [REDACTED], there is no evidence to suggest that [REDACTED]  
7 [REDACTED] are aligned with the interests of CGC customers. These  
8 are costs that CGC's parent company finds to be consistent with the interests of its  
9 shareholders, and therefore, such costs should be assigned below the line. Secondly, CGC  
10 ratepayers should not be required to shoulder costs [REDACTED]  
11 [REDACTED] This adjustment is shown on Confidential Exhibit DND-7, along with  
12 the calculation of O&M Adjustment No. 3.

13 **V. CONCLUSION**

14 **Q25. DOES THIS CONCLUDE YOUR TESTIMONY?**

15 A25. Yes. However, I reserve the right to supplement my testimony if new information becomes  
16 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

AFFIDAVIT

I, David N. Dittemore, 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.

  
DAVID N. DITTEMORE

Sworn to and subscribed before me  
this 4th day of June, 2025.

  
NOTARY PUBLIC



My commission expires: 1/31/2027



## **David Dittmore**

**Exhibit DND-1**

### **Utility Regulatory Experience (Listing of Testimony provided from 2015 – current is attached)**

#### **Principal – Blue River Consulting – July 2021 – Current**

Provide expert witness testimony on behalf of clients in the areas of utility revenue requirement, regulatory policy, tariff provisions, and civil litigation.

#### **Tennessee Attorney General's Office; Financial Analyst 2017 – July 2021**

Developed recommendations on behalf of the TN AG's office representing retail customers in matters before the Tennessee Public Utility Commission. Responsible for preparing expert witness testimony and pre-filed exhibit as well as responding to cross-examination questions in contested technical hearings before the Commission. In this position I also spend a significant amount of time explaining technical regulatory issues to attorneys and other AG Staff.

#### **Kansas Gas Service, Division of One Gas (OGS); Director Regulatory Affairs 2014 – 2017; Manager Regulatory Affairs, 2007 - 2014**

Responsible for directing the regulatory activity of Kansas Gas Service (KGS), a division of ONE Gas, serving approximately 625,000 customers throughout central and eastern Kansas. In this capacity I formulated strategic regulatory objectives for KGS, formulated strategic legislative options for KGS and led a Kansas inter-utility task force to discuss those options, participated in ONE Gas financial planning meetings, hired and trained new employees and provided recommendations on operational procedures.

#### **Principal Strategic Regulatory Solutions; 2003 -2007**

Serving clients regarding revenue requirement and regulatory policy issues in the natural gas, electric and telecommunication sectors.

#### **Kansas Corporation Commission; 1984- 1999**

Utilities Division Director - 1997 - 1999; Responsible for managing employees with the goal of providing timely, quality recommendations to the Commission covering all aspects of natural gas, telecommunications and electric regulation; respond to legislative inquiries as requested; sponsor expert witness testimony before the Commission on selected key regulatory issues; provide testimony before the Kansas legislature on behalf of the KCC regarding proposed utility legislation; manage a budget in excess of \$2 Million; recruit professional staff; monitor trends, current issues and new legislation in all three major utility industries; address personnel issues as necessary to ensure that the goals of the agency are being met; negotiate and reach agreement where possible with utility personnel on major issues pending before the Commission including mergers and acquisitions.

Asst. Division Director - 1996 - 1997; Perform duties as assigned by Division Director.

## **Exhibit DND-1**

Chief of Accounting 1990 - 1995; Responsible for the supervision of employees within the accounting section; areas of responsibility included providing expert witness testimony; hired and provided hands-on training for new employees; coordinated and managed consulting contracts on major staff projects such as merger requests and rate increase proposals;

Managing Regulatory Auditor, Senior Auditor, Regulatory Auditor 1984 - 1990; Performed audits and analysis as directed; provided expert witness testimony on numerous occasions before the KCC; trained and directed less experienced auditors on-site during regulatory reviews.

### **Education**

- B.S.B.A. (Accounting) Central Missouri State University
- Passed CPA exam; (Oklahoma certificate # 7562) – Not a license to practice

### **Other**

- Board Member – Financial Research Institute 2007 – 2017
- Vice Chair – NASUCA Accounting Committee, active member NASUCA Natural Gas and Water Committees

	Jurisdiction - Docket/Case Number	Employee - E Consultant - C	Client/Employer	Utility
<b>Tennessee</b>				
1	17-00014 Integra Water CCN	E	Tennessee Attorney General	Integra Water Utility
2	17-00108 Tennessee Water Service Emergency Rate Relief	E	Tennessee Attorney General	Tennessee Water Service
3	17-00138 Piedmont Natural Gas Integrity Management Rider	E	Tennessee Attorney General	Piedmont Natural Gas
4	17-00124 Tennessee American Water Company Capital Rider	E	Tennessee Attorney General	Tennessee American Water
5	17-00143 Kingsport Power Company Capital Rider Mechanism	E	Tennessee Attorney General	Kingsport Power Company
6	18-00022 Tennessee American Water Company Capital Rider	E	Tennessee Attorney General	Tennessee American Water
7	18-00067 Atmos Energy Corporation Annual Review Mechanism	E	Tennessee Attorney General	Atmos Energy Company
8	18-00097 Atmos Energy Corporation Annual Review Mechanism	E	Tennessee Attorney General	Atmos Energy Company
9	18-00017 Chattanooga Natural Gas Company Base Rate Case	E	Tennessee Attorney General	Chattanooga Gas Company
10	18-00034 Atmos Energy Corporation - Tax Cuts and Jobs Act	E	Tennessee Attorney General	Atmos Energy Company
11	18-00038 Kingsport Power Company Tax Cuts and Jobs Act	E	Tennessee Attorney General	Kingsport Power Company
12	18-00039 Tennessee American Water Tax Cuts and Jobs Act	E	Tennessee Attorney General	Tennessee American Water
13	18-00040 Piedmont Natural Gas - Tax Cuts and Jobs Act	E	Tennessee Attorney General	Piedmont Natural Gas
14	19-00007 Piedmont Natural Gas Integrity Management Rider	E	Tennessee Attorney General	Piedmont Natural Gas
15	19-00018 Atmos Energy Company - Annual Review Mechanism	E	Tennessee Attorney General	Atmos Energy Company
16	19-00031 Tennessee American Water Capital Rider Reconciliation	E	Tennessee Attorney General	Tennessee American Water
17	19-00057 Navitas Natural Gas Company LLC	E	Tennessee Attorney General	Navitas Natural Gas Company
18	19-00062 Aqua/Limestone Acquisition	E	Tennessee Attorney General	Aqua Utility/Limestone Water Operating Company
19	19-00071 Sontara Old Hickory CCN	E	Tennessee Attorney General	Sontara Old Hickory
20	19-00097 Cartwright Creek Capital Surcharge	E	Tennessee Attorney General	Cartwright Creek LLC
21	19-00105 Tennessee American Water Capital Rider Reconciliation	E	Tennessee Attorney General	Tennessee American Water Company
22	19-00106 Kingsport Power Company Capital Rider Mechanism	E	Tennessee Attorney General	Tennessee American Water Company
23	20-00128 Tennessee American Water Capital Rider Reconciliation	E	Tennessee Attorney General	Tennessee American Water Company
24	20-00049 Chattanooga Gas Company - Annual Review Mechanism	E	Tennessee Attorney General	Chattanooga Gas Company
25	20-00086 Piedmont Natural Gas Base Rate Case	E	Tennessee Attorney General	Chattanooga Gas Company
26	20-00126 Tennessee American Water Regulatory Asset	C	Tennessee Attorney General	Tennessee American Water
27	20-00139 CGC Performance Based Ratemaking	C	Tennessee Attorney General	Chattanooga Gas Company
28	21-00135 Piedmont Annual Review Mechanism	C	Tennessee Attorney General	Piedmont Natural Gas
29	21-00107 Kingsport Base Rate Case	C	Tennessee Attorney General	Kingsport Power Company
30	21-00048 CGC Annual Review Mechanism	C	Tennessee Attorney General	Chattanooga Gas Company
31	21-00053 Limestone and Cartwright Creek Acquisition	C	Tennessee Attorney General	Central States Water Company
32	21-00107 Kingsport Base Rate Case	C	Tennessee Attorney General	Kingsport Power Company
33	22-00004 CGC Tariff Amendments	C	Tennessee Attorney General	Chattanooga Gas Company
34	22-00072 Tennessee American Water Capital Rider Reconciliation	C	Tennessee Attorney General	Tennessee American Water
35	22-00087 Superior Base Rate Case	C	Tennessee Attorney General	Superior Wastewater Company
36	22-00010 Atmos Annual Review Mechanism	C	Tennessee Attorney General	Atmos Energy Company
37	22-00021 Tennessee American Water Capital Rider Reconciliation	C	Tennessee Attorney General	Tennessee American Water
38	23-00018 Tennessee American Water Capital Rider Reconciliation	C	Tennessee Attorney General	Tennessee American Water
39	23-00035 Piedmont Annual Review Mechanism	C	Tennessee Attorney General	Piedmont Natural Gas
40	24-00011 Tennessee American Water Capital Rider Reconciliation	C	Tennessee Attorney General	Tennessee American Water
41	24-00032 Tennessee American Water Base Rate Case	C	Tennessee Attorney General	Tennessee American Water
42	24-00036 Piedmont Annual Review Mechanism	C	Tennessee Attorney General	Piedmont Natural Gas
43	25-00016 Tennessee American Water Company - Capital Rider	C	Tennessee Attorney General	Tennessee American Water Company
<b>Iowa</b>				
44	24-0002 Iowa American Water Company - Base Rate Case	C	Iowa Office of Consumer Advocate	Iowa American Water Company
<b>Kansas</b>				
45	23-FRPG-461-RTS-CON - Contract/Base Rate Approval	C	Freedom Pipeline	Freedom Pipeline
46	16-KGSG-491-RTS KGS Base Rate Case	E	Kansas Gas Service	Kansas Gas Service, a Division of ONE Gas
47	23-KGSG-719-TAR Kansas Gas Service Tariff Proposal	C	Kansas Corporation Commission Staff	Kansas Gas Service, a Division of ONE Gas
48	14-ANGG-119-COM Contract Litigation	C	Freedom Pipeline	Freedom Pipeline/Anadarko Petroleum
<b>Kentucky</b>				
49	22-000432 Bluegrass Water	C	Kentucky Attorney General	Central States Water Company
50	2021-00183 Columbia Natural Gas Base Rate Case	C	Kentucky Attorney General	Columbia Natural Gas Company
51	2024-00346 Delta Natural Gas Base Rate Case	C	Kentucky Attorney General	Delta Natural Gas Company
<b>Ohio</b>				
52	23-549-EL-RDR Duke Energy Distribution Capital Rider	C	Ohio Consumer's Counsel	Duke Energy
53	23-895-GA-ALT Dominion Energy Ohio - Alternative Regulatory Plan	C	Ohio Consumer's Counsel	Dominion Energy Ohio

**Chattanooga Gas Company**  
**Docket No. 25-00028**  
**2024 Annual Rate Review**

**Exhibit DND-3**

**Rate Base Adjustment No. 1**  
**To Eliminate ADIT Associated with Non-Recoverable Items**

Source: Response to CA 2-06 Attachment A

<b>Month</b>	<b>Amount</b>
December	\$ 66,071
January	68,197
February	69,849
March	108,156
April	112,114
May	115,447
June	119,299
July	122,583
August	125,433
September	64,831
October	30,976
November	33,617
December	<u>35,317</u>
Test Year Average Adjustment	<u><u>\$ 82,453</u></u>

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Exhibit DND-4

Summary of O&M Adjustments

		Composite Tax Rate 26.135% CGC Schedule 12		Revenue Conversion Factor 1.347169 CGC Schedule 12	
Line No.	Item	Amount	Income Tax Exp Increase	Operating Income Increase	Revenue Requirement Impact
1	To Eliminate Costs Properly Recorded Below the Line	\$ (6,958)	\$ 1,818	\$ 5,140	\$ (6,924)
2	To Eliminate Below the Line Dues charged to Accounts 912 and 921	\$ (8,573)	\$ 2,240	\$ 6,332	\$ (8,531)
3	To Eliminate Unidentified Charges	(3,251)	\$ 850	\$ 2,401	\$ (3,235)
4	To Eliminate Unnecessary Costs	<u>(2,134)</u>	<u>\$ 558</u>	<u>\$ 1,576</u>	<u>\$ (2,123)</u>
5	Total O&M Adjustments	<u><u>(20,915)</u></u>	<u><u>5,466</u></u>	<u><u>15,449</u></u>	<u><u>(20,812)</u></u>

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**Exhibit DND-5**

**Elimination of Unecessary O&M Costs**

**Source: Response to CA 1-10**

<b>Source: CA 1-10</b>	<b>Amount</b>
Diversity, Equity and Inclusion Department Costs	<u><u>\$ 6,958</u></u>