

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

**IN RE:** )  
 )  
**CHATTANOOGA GAS COMPANY** )  
**PETITION FOR APPROVAL OF ITS** )  
**2025 ANNUAL RATE REVIEW FILING** ) **DOCKET NO. 26-00032**  
**PURSUANT TO TENN. CODE ANN. §** )  
**65-5-103 (d)(6)** )  
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**CONSUMER ADVOCATE’S SECOND SET OF DISCOVERY REQUESTS  
TO CHATTANOOGA GAS COMPANY**

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This Second Set of Discovery Requests is hereby served upon Chattanooga Gas Company (“CGC” or the “Company”), pursuant to Rules 26, 33, 34 and 36 of the Tennessee Rules of Civil Procedure and Tenn. Comp. R. & Regs. 1220-01-02-.11. The Consumer Advocate Division of the Tennessee Attorney General’s Office (“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, 500 Dr. Martin L. King Jr. Blvd., Nashville, Tennessee 37243, c/o Ryan McGehee, on or before Tuesday June 2<sup>nd</sup>, by 2:00 p.m. (CDT).

**PRELIMINARY MATTERS AND DEFINITIONS**

This Second Set of Discovery Requests incorporates by reference the same Preliminary Matters and Definitions as outlined in the Consumer Advocate’s First Discovery Request to CGC, are to be considered continuing in nature, and are to be supplemented from time to time as information is received by the Company which would make a prior response inaccurate, incomplete, or incorrect.

**SECOND SET OF DISCOVERY REQUESTS**

**2-1. Depreciation.** Refer to the Direct Testimony of Tiffani Weems, File <CGC Weems Exhibit TW-1.xlsx>. Specifically refer to Tab “Schedule 14.3”, Cell H8 regarding Active Service Lines of 84,521. Provide the source and support for the referenced DOT Report showing 84,521 service lines that appears as an unreferenced hard-coded number.

**RESPONSE:**

**2-2. Depreciation.** Refer to the Direct Testimony of Tiffani Weems, File <CGC Weems Exhibit TW-1.xlsx>. Specifically refer to Tab “Schedule 14.3”, Cell H19 regarding Inactive Service Lines of 4,783. Provide the source and support for the 4,783 inactive service lines that appears as an unreferenced hard-coded number.

**RESPONSE:**

**2-3. Revenues.** Refer to the Direct Testimony of Tiffani Weems, File <CGC Weems Exhibit TW-1.xlsx>. Specifically refer to Tab “Schedule 15.1”, Cells F429 to O429 regarding the Non-Gas Revenue book amounts for February 2025 through December 2025. It appears that the formulas in these cells fail to capture the Special Contract revenues. Specifically, we note that the formula for January 2025 appears to be correct. We also note that the values presented here do not match the values on Schedule 15. If the Company determines that this formula is in error, then provide an updated calculation. If the Company determines that this formula is correct, then provide an explanation for the disparity.

**RESPONSE:**

**2-4. Revenues.** Refer to the Direct Testimony of Tiffani Weems, File <CGC Weems Exhibit TW-1.xlsx>. Specifically refer to Tab “Schedule 15”, Cells B55 to P55 which show 1 customer per month for the Residential Gas Lighting Rate Schedule. Reconcile this data

with Schedule 35.20, Tab “Margin Review”, Rows B37 to R37 which shows 10 customers per month for the Residential Lighting Rate Schedule.

**RESPONSE:**

**2-5. Revenues.** Refer to the Direct Testimony of Tiffani Weems, File <CGC Weems Exhibit TW-1.xlsx>. Specifically refer to Tab “Schedule 15”, Cells B99 to P99 which show 323 total bills for the C1-A/C Rate Schedule. Reconcile this data with Schedule 35.20, Tab “Margin Review”, Cells B48 and B60 which indicates that this customer data has already been included in the regular C1 Rate Schedule.

**RESPONSE:**

**2-6. Revenues.** Refer to the Direct Testimony of Tiffani Weems, File <CGC Weems Exhibit TW-1.xlsx>. Specifically refer to Tab “Schedule 15”, Cells B126 to P126 which shows 407,375 Dth Demand Determinants for the C2 Rate Schedule. Reconcile this data with Schedule 35.20, Tab “Margin Review”, Cells B73 to R74 which shows total billed and accrued Demand Determinants of 407,528 Dth. It appears that the Company has only considered billed demand determinants on Schedule 15 for the C-2 Rate Schedule but then considers both billed and unbilled volumes determinants. Explain and reconcile this inconsistency.

**RESPONSE:**

**2-7. Revenues.** Refer to the Direct Testimony of Tiffani Weems, File <CGC Weems Exhibit TW-1.xlsx>. Specifically refer to Tab “Schedule 6”, Cell K21 regarding the Special Contract annualization adjustment of \$5,402 which appears as a hard-coded amount. Next refer to Schedule 15.1, Cell Q423 which shows the support for the Special Contract

annualization adjustment to be \$5,812. Provide a reconciliation of these two amounts. If the Company determines that either of these schedules are in error, then provide an updated calculation. If the Company determines that these schedules are correct, then provide an explanation for the disparity.

**RESPONSE:**

**2-8. Revenues.** Refer to the Direct Testimony of Tiffani Weems, File <CGC Weems Exhibit TW-1.xlsx>. Specifically refer to Tab “Schedule 15”, Cell P185 which contain the total 2025 Rate Block 1 Volumes to T-3 customers of 1,365,596 therms. Next refer to Schedule 15.1, Cell Q194 which contain the total 2025 Rate Block 1 Volumes to T-3 customers of 1,393,450 therms. Provide a reconciliation of the difference between these two amounts which should be equal. If the Company determines that either of these schedules are in error, then provide an updated calculation. If the Company determines that these schedules are correct, then provide an explanation for the disparity.

**RESPONSE:**

**2-9. Revenues.** Refer to the Direct Testimony of Tiffani Weems, File <CGC Weems Exhibit TW-1.xlsx>. Specifically refer to Tab “Schedule 15”, Cell L341 which shows 15 bills for September 2025 for the T-3 rate schedule. Next, refer to Schedule 15.1, Cell M369 which shows 17 bills for September 2025 for the T-3 rate schedule. Provide a reconciliation of the difference between these two amounts which should be equal. If the Company determines that either of these schedules are in error, then provide an updated calculation. If the Company determines that these schedules are correct, then provide an explanation for the disparity.

**RESPONSE:**

**2-10. AFUDC.** Refer to the Direct Testimony of Tiffani Weems, File <CGC Weems Exhibit TW-1.xlsx>. Specifically refer to Tab “Inputs”, Cells A62 to B93 regarding the Removal of Non-Allocable Plant and the AFUDC Capitalized Interest Adjustment and provide the following information.

- a. Provide the source and support for the Non-Allocated Plant Adjustment of \$-746,515 in Cell B69.
- b. Provide the source and support for Allocated CWIP Adjustment of \$-160,303 in Cell B73.
- c. Provide a narrative description of the need for Capitalized Interest Adjustment in the ARM of \$-95,442 in Cell B93 along with an explanation of why this adjustment wasn't included in previous filings.

**RESPONSE:**

**2-11. Association Memberships.** Refer to the Direct Testimony of Tiffani Weems, File <CGC Weems Exhibit TW-1.xlsx>. Specifically refer to Tab “Schedule 24”, Cell J15 regarding costs for Association Memberships for May 2025 for \$657. The formula for this cell appears to be in error because it does not refer to Operating Leases of \$435 on Schedule 24.1, Cell I25. Reconcile this discrepancy. If the Company determines that this formula is in error, then provide an updated calculation. If the Company determines that this formula is correct, then provide an explanation for the disparity.

**RESPONSE:**

**2-12. Please Association Memberships.** Refer to the Company's response to CA1-25 in Docket 23-00029 regarding the source and support for the lobbying portion of Organization Dues. Provide this same information for each month of 2025.

**RESPONSE:**

**2-13. Cost Allocation Manual.** [REDACTED]

**RESPONSE:**

**2-14. Other Revenue.** Refer to the Direct Testimony of Tiffani Weems, File <CGC Weems Exhibit TW-1.xlsx>. Specifically refer to Tab “Schedule 6”, Cell N27 regarding the Other Normalization Adjustment of \$-14,556 for Other Revenue. In past ARM calculations, this adjustment referenced the 4-year average of Other Revenue on Schedule 28 which would be \$9,101. However, in this current filing, the Company has modified this formula to now reference the net amount of Other Revenue adjustments. Provide a reconciliation of the difference between these two methodologies. If the Company determines that this schedule is in error, then provide an updated calculation. If the Company determines that this schedule is correct, then provide an explanation for this methodology change.

**RESPONSE:**

**2-15. Income Taxes.** Refer to the Direct Testimony of Tiffani Weems, File <CGC Weems Exhibit TW-1.xlsx>. Specifically refer to Tab “Inputs”, Cells A99 to D108 regarding Federal Research & Development Tax Credits that total to \$42,998. Provide the source and support for these amounts that are unreferenced, hard-coded numbers.

**RESPONSE:**

**2-16. Income Taxes.** Refer to the Direct Testimony of Tiffani Weems, File <Schedule 35.05b - EDIT Bal Act (WP)(2025).xlsx>. Specifically, refer to Cells C41 to C42 of this

spreadsheet which provide the state deferred tax liability amortization of \$-18,081 and the federal deferred tax liability amortization \$-35,585. Both amounts appear as hard-coded values. Provide the calculations used to compute these amounts.

**RESPONSE:**

**2-17. ADIT.** Refer to the Direct Testimony of Tiffani Weems, File <Schedule 35.07 ADIT Workpaper.xlsx>. Specifically refer to Tab “Schedule 35.07 – Summary”, Cells A132 to AY132 which contain the 2025 monthly “Pro Forma Adjustment (NOL)” amounts. Provide the source and support for the monthly amounts which appear as unreferenced, hard-coded values.

**RESPONSE:**

**2-18. Other Taxes.** Refer to the Direct Testimony of Tiffani Weems, File <Schedule 35.09 Renewco Branch Inspection Fees.xlsx>, Tab “Schedule 35.09”. Provide a narrative description of the Renewco Branch Inspection Fees, along with an explanation of the reason for this adjustment

**RESPONSE:**

**2-19. Please Lobbying.** Refer to the Direct Testimony of Tiffani Weems, File <Schedule 35.10b Lobbying WP-Dues.xlsx>, Tab “SYST Extract” and provide the following information.

- a. Confirm that the data set that provides this pivot table is contained on Schedule 19.3. If this data set is not contained on Schedule 19.3, then either provide the data set, or identify the location of this data set.
- b. Identify the specific query criteria that produces the pivot table contained on this schedule, which currently lists "Multiple Items" as the criteria.

**RESPONSE:**

**2-20. Lobbying.** Refer to the Direct Testimony of Tiffani Weems, File <Schedule 35.10c Lobbying Related Expenses (1637).xlsx>, Tab “Govt Affairs.SYS” and provide the following information.

- a. Confirm that the data set that provides this pivot table is contained on Schedule 19.3. If this data set is not contained on Schedule 19.3, then either provide the data set, or identify the location of this data set.
- b. Identify the specific query criteria that produces the pivot table contained on this schedule, which includes “Project Name & Number” as a criteria field.

**RESPONSE:**

**2-21. Non-Allocable Plant.** Refer to the Direct Testimony of Tiffani Weems, File <Schedule 35.13 - ASC Non-Allocable Plant (2025).xlsx>, Tab “Tab3 (CWIP)”. Specifically refer to Cell E161 of this spreadsheet which calculates the “Assigned Total Projects” and has a value of \$19,903,185. Provide a narrative description on how the Company distinguishes between “assigned” vs. “non-assigned” projects for this calculation.

**RESPONSE:**

**2-22. Revenues.** Refer to the Direct Testimony of Tiffani Weems, File <CGC Weems Exhibit TW-1.xlsx>. Specifically refer to Tab “Schedule 15.1”, Cells P464 to P468 regarding the C2 volumes for December 2025 that total to 385,940 Dekatherms. The references in these cells appear to be in error and do not tie to the volumes on Schedule 15. Provide a reconciliation of the C2 volumes on Schedule 15.1 with the C2 volumes on Schedule 15. If the Company determines that this formula is in error, then provide an updated calculation. If the Company determines that this formula is correct, then provide an explanation for the disparity.

**RESPONSE:**

**2-23. Revenues.** Refer to the Direct Testimony of Tiffani Weems, File <Schedule 35.18 Revenue - Other Normalization Revenue.xlsx>. Specifically refer to Cells A18 to D23 regarding the Customer Charge Revenue Adjustment for the C-1 customer class totaling \$45,639. In the Company's adjustment, it appears that C-1 A/C customers were included in the bill counts but excluded in the recorded revenue of \$4,606,643 in Cell D22. Provide a reconciliation of these calculations. If the Company determines that this formula is in error, then provide an updated calculation. If the Company determines that this formula is correct, then provide an explanation for the disparity.

**RESPONSE:**

**2-24. Revenues.** Refer to the Direct Testimony of Tiffani Weems, File <CGC Weems Exhibit TW-1.xlsx>. Specifically refer to Tab "Schedule 6, Cell N13 regarding the elimination of Gas Light revenue of \$428 as an Other Normalization Adjustment. Explain the Company's rationale for eliminating this revenue item.

**RESPONSE:**

**2-25. Revenues.** Refer to the Direct Testimony of Tiffani Weems, File <Schedule 35.19 Inactive Service Lines.xlsx>, Tab "Pivot" regarding the Company's calculation of inactive service lines. Identify where in the ARM calculation that this data is used or required.

**RESPONSE:**

**2-26. Allocations.** [REDACTED]  
[REDACTED]  
[REDACTED]

**RESPONSE:**

**2-27. Rate Base.** Refer to the Direct Testimony of Tiffani Weems, File <Schedule 35.25 Tenant Improvement Allowance.xlsx> and provide the following information.

- a. Provide a narrative description of the leased property, including which property this replaces, and which employees will be housed at this property.
- b. The monthly ROU liability on Schedule 35.25 matches the variable monthly ROU liability on Schedule 2a1. However, the ROU asset on Schedule 2a1 only uses the ROU asset value at 4-30-25 for all months. Explain this variance.
- c. Provide the support for monthly “Basic Rent-Cash” amounts shown in Column C of Schedule 35.25.
- d. Provide the support for the monthly “Parking-Cash Rent” amounts shown in Column E of Schedule 35.25.
- e. Provide the support for the “Lessor Paid Incentives” amount shown in Cell N14 of Schedule 35.25.
- f. Provide the support for the lease term of 154 months shown in Cell J13 of Schedule 35.25.

**RESPONSE:**

**2-28. Other Taxes.** Refer to the Direct Testimony of Tiffani Weems, File <Schedule 35.26 - TOIT Workpaper.xlsx> and provide the following information.

- a. Identify previous Commission approval for this type adjustment. If this is a new proposed adjustment, then provide a narrative of the need for this adjustment.
- b. Provide the source and support for the 2024 Gross Receipts Tax amount of \$1,186,672 in Cell D16 which appears as an unreferenced hard-coded number.
- c. Provide the source and support for the 2025 Gross Receipts Tax amount of \$907,620 in Cell D15 which appears as an unreferenced hard-coded number.
- d. Provide a narrative explanation of the nature for “Account 40810045 - TOIT Other Taxes” on Row 13 of the “IS Statement” tab of this spreadsheet that includes the \$701,876 August adjustment in Cell I13.
- e. Provide the source and support for the \$701,876 August “True-up” Adjustment in Cell I13 of the “IS Statement” tab of this spreadsheet.
- f. Provide the source and support for the \$1,391,063 August “True-up” Adjustment in Cell I12 of the “IS Statement” tab of this spreadsheet.
- g. Provide the source and support for the “Previously Accrued” amount of \$46,172 in Cell E35 of the “Schedule 35.26” tab of this spreadsheet which appears as an unreferenced hard-coded amount.
- h. Provide the source and support for the “Adjustment to Establish Prepaid Gross Receipts Tax” of \$-453,801 in Cell E24 of the “Schedule 35.26” tab on this spreadsheet which appears as an unreferenced hard-coded amount





RESPECTFULLY SUBMITTED,



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**TPUC Docket No. 26-00032**

*CA's 2<sup>nd</sup> DR to CGC*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served via U.S. Mail, with a courtesy copy by electronic mail, provided upon:

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This 26<sup>th</sup> day of May, 2026.



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**RYAN MCGEGEE**  
Assistant Attorney General