

IN THE TENNESSEE PUBLIC UTILITY COMMISSION
AT NASHVILLE, TENNESSEE

IN RE:	)	
	)	
CHATTANOOGA GAS COMPANY	)	
PETITION FOR APPROVAL OF ITS 2025	)	DOCKET NO. 26-00032
ANNUAL RATE REVIEW FILING	)	
PURSUANT TO TENN. CODE	)	
ANN. § 65-5-103(d)(6)	)	

MOTION TO HEAR THE CONSUMER ADVOCATE’S MOTION TO STRIKE OR IN
THE ALTERNATIVE TO RESET THE PROCEDURAL SCHEDULE IN THIS DOCKET
OR SEVER THE COMPANY’S PROPOSED CHANGE IN METHODOLOGY

The Consumer Advocate Division of the Office of the Attorney General (“Consumer Advocate”), requests the Administrative Judge to hear the Consumer Advocate’s Motion to Strike or in the Alternative to Reset the Procedural Schedule in this Docket or Sever The Company’s Proposed Change in Methodology (“*Motion to Strike*”) at the scheduled pre-hearing conference on July 30, 2026.

Rule 1220-04-02-.12(1)(e) allows for the disposition of any pending motion at pre-hearing conferences. In this matter, the Administrative Judge’s procedural schedule provides for the filing of pre-hearing motions on July 21, 2026, and a pre-hearing conference on July 30, 2026. The Consumer Advocate’s *Motion to Strike* was filed on July 17, 2026. The *Motion to Strike* was filed as soon as possible before the bulk of the Consumer Advocate traveled out of town to attend conferences for the National Association of State Utility Consumer Advocates and the National Association of Regulatory Utility Commissioners over the period of July 19 to July 22, 2026.

On July 22, 2026, the Company contacted the Administrative Judge and requested an expedited ruling on the motion to strike and represented that no party requested oral argument.¹ The Administrative Judge indicated a ruling would be published by the end of the week.² Having returned from out of town on July 23, 2026, the Consumer Advocate stated it did not waive a hearing on the motion at the pre-hearing conference scheduled for July 30, 2026. The Company later responded and indicated it relied on Rule 1220-01-02-.06(4) which addresses preliminary motions. The Consumer Advocate is unaware of this specific rule ever being invoked to prevent a hearing on a substantive pre-hearing motion.

Parties rely on the procedural schedule in dockets to plan its workload. Pre-Hearing motions were due on July 21, 2026, and the pre-hearing conference was set on July 30, 2026. This docket does not take place in a vacuum. The Company's position that it is eager to see the motion resolved before the settlement deadline is not sufficient to outweigh the right of another party to respond to the claims made in a 14-page response. In fact, such tactics dim the prospect of settlement. In filing this motion, the Consumer Advocate does not suggest that the common practice of motions being heard be changed and require specific requests to hear the motion. Nevertheless, given the Company's request and the instant circumstances, the Consumer Advocate is filing this motion to maintain a clear record.

[Intentionally Left Blank]

¹ Email to Administrative Judge from Consumer Advocate, July 23, 2026. A copy of this email exchange is attached as Exhibit A.

² *Id.*

WHEREFORE, the Consumer Advocate respectfully requests that the Administrative Judge grant the Consumer Advocate's Motion to Hear the *Motion to Strike* at the scheduled pre-hearing conference on July 30, 2026.

RESPECTFULLY SUBMITTED,



RYAN MCGEHEE (BPR No. 025559)

Assistant Attorney General

SHILINA BROWN (BPR No. 020687)

Senior Assistant Attorney General

Office of the Tennessee Attorney General

Consumer Advocate Division

P.O. Box 20207

Nashville, Tennessee 37202-0207

Phone: (615) 360-4219

Fax: (615) 741-1026

Email: Ryan.McGehee@ag.tn.gov

Email: Shilina.Brown@ag.tn.gov

TPUC Docket No. 26-00032

Motion to Hear Consumer Advocate's Motion to Strike

CERTIFICATE OF SERVICE

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

J.W. Luna, Esq.
John Dollarhide, Esq.
Butler Snow LLP
1320 Adams Street, Suite 1400
Nashville, TN 37208
Telephone: (615) 651-6700
Email: jw.luna@butlersnow.com
John.dollarhide@butlersnow.com

Jeff A. Petrea
Director, External Affairs
Chattanooga Gas Company
2207 Olan Mills Drive
Chattanooga, TN 37421
Email: japetrea@southernco.com

Elizabeth Wade, Esq
Chief Regulatory Counsel
Southern Company Gas
Ten Peachtree Place, NW
Atlanta, GA 30309
Telephone: (404) 584-3160
Email: ewade@southernco.com

This 23rd day of July 2026.



RYAN MCGEHEE
Assistant Attorney General

Exhibit A

From: Ryan McGehee

Sent: Thursday, July 23, 2026 11:41 AM

To: 'John Dollarhide' <John.Dollarhide@butlersnow.com>; 'Aaron Conklin' <Aaron.Conklin@tn.gov>

Cc: Shilina B. Brown <Shilina.Brown@AG.TN.GOV>; J.W. Luna <JW.Luna@butlersnow.com>; 'Monica Smith-Ashford' <Monica.Smith-Ashford@tn.gov>; 'Kelly Grams' <Kelly.Grams@tn.gov>; 'Michelle Mairs' <Michelle.Mairs@tn.gov>; 'Craig Cox' <Craig.Cox@tn.gov>; 'Darlene Standley' <Darlene.Standley@tn.gov>; 'Jerry Kettles' <Jerry.Kettles@tn.gov>

Subject: RE: Docket No. 26-00032, CGC ARM -- CAD Motion to Strike [IWOV-BUTLERSNOW.FID9855332]

Judge Conklin,

To make the record clear, I'll file a motion for a hearing on the 30th.

Thanks,

Ryan

From: John Dollarhide <John.Dollarhide@butlersnow.com>

Sent: Thursday, July 23, 2026 11:20 AM

To: 'Aaron Conklin' <Aaron.Conklin@tn.gov>

Cc: Shilina B. Brown <Shilina.Brown@ag.tn.gov>; J.W. Luna <JW.Luna@butlersnow.com>; 'Monica Smith-Ashford' <Monica.Smith-Ashford@tn.gov>; 'Kelly Grams' <Kelly.Grams@tn.gov>; 'Michelle Mairs' <Michelle.Mairs@tn.gov>; 'Craig Cox' <Craig.Cox@tn.gov>; 'Darlene Standley' <Darlene.Standley@tn.gov>; Ryan McGehee <Ryan.McGehee@ag.tn.gov>; 'Jerry Kettles' <Jerry.Kettles@tn.gov>

Subject: RE: Docket No. 26-00032, CGC ARM -- CAD Motion to Strike [IWOV-BUTLERSNOW.FID9855332]

Judge Conklin,

To reiterate, CGC's request for an expedited ruling on the Consumer Advocate's motion was based on the fact that neither party requested oral argument under Rule 1220-01-02-.06(4).

John Dollarhide
Butler Snow LLP
615-651-6782

From: Ryan McGehee <Ryan.McGehee@ag.tn.gov>
Sent: Thursday, July 23, 2026 10:09 AM
To: Aaron Conklin <Aaron.Conklin@tn.gov>; John Dollarhide <John.Dollarhide@butlersnow.com>
Cc: Shilina B. Brown <Shilina.Brown@ag.tn.gov>; J.W. Luna <JW.Luna@butlersnow.com>; Monica Smith-Ashford <Monica.Smith-Ashford@tn.gov>; Kelly Grams <Kelly.Grams@tn.gov>; Michelle Mairs <Michelle.Mairs@tn.gov>; Craig Cox <Craig.Cox@tn.gov>; Darlene Standley <Darlene.Standley@tn.gov>; Jerry Kettles <Jerry.Kettles@tn.gov>
Subject: RE: Docket No. 26-00032, CGC ARM -- CAD Motion to Strike [IWOV-BUTLERSNOW.FID9855332]

Judge Conklin,

I've been out of town and seeing this email this morning. The Advocate does not waive a hearing on the motion. This was a unilateral request by the Company. The Advocate is fine with a hearing on the 30th. That was communicated to counsel last Friday. The procedural schedule provides for pre-hearing motions on the 21st and a pre-hearing conference on the 30th. Parties depend on procedural schedules and build their schedules around it.

Thank you,

Ryan

From: Aaron Conklin <Aaron.Conklin@tn.gov>
Sent: Wednesday, July 22, 2026 10:51 AM
To: John Dollarhide <John.Dollarhide@butlersnow.com>
Cc: Ryan McGehee <Ryan.McGehee@ag.tn.gov>; Shilina B. Brown <Shilina.Brown@ag.tn.gov>; J.W. Luna <JW.Luna@butlersnow.com>; Monica Smith-Ashford <Monica.Smith-Ashford@tn.gov>; Kelly Grams <Kelly.Grams@tn.gov>; Michelle Mairs <Michelle.Mairs@tn.gov>; Craig Cox <Craig.Cox@tn.gov>; Darlene Standley <Darlene.Standley@tn.gov>; Jerry Kettles <Jerry.Kettles@tn.gov>
Subject: Re: Docket No. 26-00032, CGC ARM -- CAD Motion to Strike [IWOV-BUTLERSNOW.FID9855332]

Thank you for this email. I am reviewing the Motion and Response and anticipate publishing a ruling by the end of this week.
Aaron

From: John Dollarhide <John.Dollarhide@butlersnow.com>
Sent: Wednesday, July 22, 2026 10:30 AM
To: Aaron Conklin <Aaron.Conklin@tn.gov>
Cc: 'Ryan McGehee' <Ryan.McGehee@ag.tn.gov>; Shilina B. Brown <Shilina.Brown@ag.tn.gov>; J.W. Luna <JW.Luna@butlersnow.com>

Subject: [EXTERNAL] Docket No. 26-00032, CGC ARM -- CAD Motion to Strike [IWOV-BUTLERSNOW.FID9855332]

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Judge Conklin,

CGC writes regarding the Consumer Advocate Division's Motion to Strike or, in the Alternative, to Reset the Procedural Schedule or Sever the Company's Proposed Change in Methodology. CGC has filed its response in opposition, and the motion is ripe for decision. Both filings are attached for convenience.

CGC respectfully submits that a hearing is not necessary and that the Motion may be decided on the papers. Neither the Consumer Advocate nor CGC requested oral argument under Rule 1220-01-02-.06(4), and CGC believes the parties' thorough filings provide a sufficient basis for a ruling.

In light of the fast-approaching dates in the Procedural Schedule, including the July 27 settlement date and the July 30 Pre-Hearing Status Conference date, and considering that neither party has requested oral argument, CGC respectfully requests an expedited ruling on the motion.

John H. Dollarhide

Butler Snow LLP

D: (615) 651-6782 | F: (615) 651-6701

1320 Adams Street, Suite 1400, Nashville, TN 37208

John.Dollarhide@butlersnow.com | [vCard](#) | [Bio](#)

[X \(Twitter\)](#) | [LinkedIn](#) | [Facebook](#) | [YouTube](#)

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