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Chattanooga Gas

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Tennessee Public Utility Commission
502 Deaderick Street, 4th Floor
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20-00047

Chairman Robin L. Morrison,

I am again responding to the Commission's request to provide a weekly update regarding Chattanooga Gas's (CGC) response to the novel coronavirus (COVID-19). This updated letter is intended to give TPUC a general overview of our plans to support necessary public safety actions while meeting our ongoing obligation to serve our customers and communities. We are following relevant health and safety guidelines and will continue to adapt to changes to those guidelines as the situation progresses. ***There were no notable changes to our processes from last week's letter (dated 4/21/20).***

Operational and Business Changes: [After temporarily reducing the scope of work being performed in order to focus on emergency response to the 4/12/20 extreme weather disaster in Hamilton and Bradley Counties, on 4/17/20 CGC returned to the prior operating procedures and modifications as previously described in the following paragraphs.] Over the past several weeks, Chattanooga Gas has implemented new work procedures to address social distancing recommendations from the Centers for Disease Control and Prevention (CDC). We are adjusting our operations to manage a staff that is operating remotely in a manner that maintains our normal service standards and compliance obligations. Many of our employees – primarily corporate and office support staff – are working exclusively from home. Our field employees and contractors are working on a modified basis while continuing to deliver our core utility functions. We have equipped our field employees with personal protective equipment for appropriate occasions for their safety and to protect the community. We have provided training on personal hygiene and public health best practices. In light of Governor Lee's "Safer at Home" Executive Orders No. 22 & 23 issuing "stay at home" restrictions, CGC has reviewed our processes to ensure compliance with all relevant orders. We continue to be prepared, through our business continuity planning, to refocus only on essential and emergency services as COVID-19 impacts our workforce and the communities we serve. We've already taken great measures to protect the safety of our employees. This began with only performing essential work-orders like service activations, emergency leak response, and all tasks that are necessary for us to maintain regulatory compliance. We're also several weeks into suspending or delaying non-essential work including service disconnections, meter changes and below-ground maintenance that would cause service interruption, non-urgent compliance work, and periodic testing.

Customer Service, Billing and Communications: In recognition that the evolving landscape surrounding COVID-19 may cause financial hardship for customers impacted by employment changes or business slowdown, Chattanooga Gas has made temporary changes to our shut-offs for nonpayment (SONP) procedures. Revised to be effective March 12 per TPUC's 3/31/20 order, Chattanooga Gas suspended service disconnections for nonpayment for both residential and commercial customers. This suspension will continue in order to support Tennessee's State of Emergency. Per the Commission's order, as situations return to normal in the future, CGC will coordinate with TPUC on the best ways to reinstate SONPs and how unpaid customer bills should be treated. Customers also are being reminded through our website, email, press releases and other outlets that energy assistance options are available to support those impacted by the COVID-19 emergency. Additionally, our call center is supporting customers and field employees by implementing a screening procedure to help identify customers' health status before assigning work and encouraging customers to reschedule nonessential work. We are utilizing Keep Me Informed (KMI) to check in with customers ahead of service calls to make sure we are prepared to help them as best we can, regardless of their health status.

Communications with State and Local Agencies: CGC has sent communications to state and local government and county emergency management agencies reminding them of our duty to serve and the modifications we are making to ensure public health. We have encouraged these agencies to officially recognize all utilities as "essential services" exempt from shelter-in-place policies that would restrict business activities. Attachment A to Governor Lee's "Safer at Home" Executive Order No. 22 specifically identifies natural gas utilities' operations and maintenance activities as Essential Infrastructure Operations which are exempt from "stay at home" restrictions. We have provided our essential personnel with letters to identify them to law enforcement as an employee providing an exempt essential service. CGC is also providing periodic updates to local chambers of commerce on our activities and coordinating with other utilities and industry associations in the state to ensure greater consistency in our ongoing response. Also, we have previously provided TPUC several written reports and updates of our responses to the crisis. Per TPUC's 3/31/20 order, CGC will submit a letter to the Commission by April 30, 2020 specifically addressing how we plan to assist customers to catch-up on their past due bill once the TN State of Emergency has ended.

Compliance and Ability to Serve: We do not anticipate any disruption to the delivery of our utility services. Chattanooga Gas will continue to monitor public health directives and modify our business methodologies accordingly in order to ensure the well-being of our customers and employees, as well as the continuity of our services. As circumstances change, if any required future modifications may impact compliance deadlines or significant workforce staffing requirements, Chattanooga Gas will inform the Tennessee Public Utility Commission immediately.

Chattanooga Gas welcomes the opportunity to work with you and your staff so that citizens and customers are protected and can continue to receive safe and reliable natural gas service. Thank you for your ongoing efforts.

Sincerely,

Paul Teague
Director, External Affairs
Chattanooga Gas Company