

BEFORE THE TENNESSEE PUBLIC UTILITY COMMISSION  
NASHVILLE, TENNESSEE

March 26, 2020

|                             |   |            |
|-----------------------------|---|------------|
| IN RE:                      | ) |            |
|                             | ) |            |
| EMERGENCY PETITION TO       | ) | Docket No. |
| SUSPEND SERVICE             | ) |            |
| DISCONNECTIONS FILED BY THE | ) | 20-000047  |
| CONSUMER ADVOCATE UNIT OF   | ) |            |
| THE FINANCIAL DIVISION OF   | ) |            |
| THE OFFICE OF THE TENNESSEE | ) |            |
| ATTORNEY GENERAL            | ) |            |
|                             | ) |            |

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CHATTANOOGA GAS COMPANY’S  
INITIAL RESPONSE TO THE  
NOTICE OF SPECIAL COMMISSION CONFERENCE

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Chattanooga Gas Company (“CGC” or “Company”), in response to the Tennessee Public Utility Commission (“Commission”) Notice of Special Commission Conference Held Electronically via WebEx issued on March 25, 2020, in the above captioned docket, does hereby provide its initial written comments for consideration by the Commission at its Special Conference on Friday in response to the *Emergency Petition to Suspend Service Disconnections* filed on March 24, 2020, by the Consumer Advocate Unit in the Financial Division of the Office of the Attorney General to initiate this docket. In furtherance of these proceedings, CGC states as follows:

1. CGC welcomes the initiative of Governor Lee and Attorney General Slatery to help protect utility customers during this national health emergency. CGC shares those concerns, and the Company has implemented policies and made important business decisions to help protect customers and employees during this unprecedented situation.

2. This Commission has already been proactive on this issue, including the “Ongoing Request for Information Related to Measures Taken During the Coronavirus COVID-19 Public Health Initiative,” signed by Chairman Morrison on March 19, 2020. By this request, the Commission has directed utilities to report weekly “their emergency operational and response plans and all measures that have been instituted to ensure the continuity of safe and reliable service and to assist their customers during this time.”

3. Pursuant to this directive, CGC made its first report on March 24, 2020, after making two prior informal reports. A copy of CGC’s March 24, 2020, letter is attached as Exhibit A. CGC’s March 24 report makes clear, among many other activities to help protect customers and employees, on March 14, 2020, CGC on its own initiative, voluntarily “suspended all service disconnections for nonpayment for both residential and commercial customers for thirty (30) days, ending April 13, 2020.”

4. In view of the *Emergency Petition*, CGC has no objection to the Commission formally ordering the suspension of service disconnections during Governor Lee’s state of emergency declaration until it expires or is cancelled.

5. CGC thanks the Commission for its leadership during this emergency. CGC looks forward to the Commission’s further guidance and the opportunity to work with the Commission to address the necessary matters that are required in order to help ensure the health, safety, and welfare of our customers and employees.

Respectively Submitted,



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**CERTIFICATE OF SERVICE**

I hereby certify that a true and exact copy of the foregoing has been provided electronically via e-mail on this the 26<sup>th</sup> day of March, 2020 to:

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March 24, 2020

Tennessee Public Utility Commission  
502 Deaderick Street, 4<sup>th</sup> Floor  
Nashville, TN 37243

Chairman Robin L. Morrison,

I am responding to the Commission's request to provide a weekly update regarding Chattanooga Gas's (CGC) response to the novel coronavirus (COVID-19). This letter is intended to give TPUC a general overview of our current and future plans to support necessary public safety actions while meeting our ongoing obligation to serve our customers and communities. While we are in an unprecedented situation, we are following relevant health and safety guidelines and adapting to changes to those guidelines as the situation progresses.

**Operational and Business Changes:** 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. We are prepared, through our business continuity planning, to respond if we need to refocus only on essential and emergency services as COVID-19 impacts our workforce and the communities we serve.

**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. Effective March 15, Chattanooga Gas suspended service disconnections for nonpayment for both residential and commercial customers for thirty (30) days, ending April 13, 2020. As situations return to normal in the future, CGC likely will need to 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. 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, as you know, we have previously provided TPUC two written reports of specific responses to the crisis.

**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 efforts.

Sincerely,



Paul Teague  
Director, External Affairs  
Chattanooga Gas Company

