



May 29, 2020

Tennessee Public Utility Commission  
Attention: Ectory Lawless, Esq., Docket Clerk  
Andrew Jackson State Office Building  
502 Deaderick Street, 4<sup>th</sup> Floor  
Nashville, TN 37243-0001

Re: Docket No. 20-00049; Chattanooga Gas Company's Petition for Approval of Its  
2019 Annual Rate Review Filing Pursuant to T.C.A. § 65-5-103(d)(6)

Ms. Lawless:

First, let me thank you for your assistance along with the assistance of TPUC's General Counsel and Technical Staff as well as the cooperation of the Consumer Advocate staff in this electronic filing format given the current declared State of Emergency.

As you will see in the attached Petition and Testimonies of our witnesses, Chattanooga Gas Company's ("CGC") is witnessing first-hand the devastating impacts COVID-19 and recent tornados are having on our region and on so many of our customers. Therefore, to minimize the impacts of the this first annual review proceeding on our customers at a time that they are truly most challenged, CGC is recommending that the Commission consider and approve the acceleration and return of certain tax credits and benefits ordered in Docket Nos. 18-00017 and 8-00035. To facilitate the acceleration of these tax credits and benefits, CGC will timely file for the for reconsideration of the Final Order in Docket No. 18-00035 to seek the amending of the Final Order, if necessary, to implement this recommendation if approved by the Commission.

Included in this filing is CGC's Petition for Approval of its 2019 Annual Rate Review filing pursuant to Tennessee Code Annotated § 65-5-103(d)(6) and in compliance with the final Order in Docket No. 17-00047 approving a Settlement Agreement.

Also included with the Petition are Direct Testimony of CGC's three witnesses:

1. Paul Leath with no Exhibits;
2. Gary Tucker accompanied by 3 Exhibits; and
3. Archie Hickerson accompanied by 9 Exhibits.

T 615.651-6700  
F 615.651.6701  
[www.butlersnow.com](http://www.butlersnow.com)

Jones Wilson (J.W.) Luna  
T 615-651-6749  
[jw.luna@butlersnow.com](mailto:jw.luna@butlersnow.com)

150 3rd Ave. South  
Suite 1600  
Nashville, TN 37201

May 29, 2016

Page 2

Numerous supporting documents and work papers are included in their Exhibits and other supporting documents and workpapers are supported by the witnesses and are provided for filing. All documents and workpapers required by the Settlement Agreement in Docket No. 19-00047 are provided in this filing.

Please note that there are a few documents which contain confidential information provided in accordance with TPUC practice and subject to a pending Protective Order issued by the Hearing Officer. The confidential documents are clearly marked and found at Schedules 27, 32, 32F, 32G, 34, 34.1 and 35.1.

All of the above documentation are being provided by access to a shared link at this link:

<https://bergersingerman.sharefile.com/share/view/8ae081cf5be941fb/fo71f642-80ce-4197-9b3d-78360758d5ba>

Attached to this transmittal email for convenience are the three Direct Testimonies, the Petition, and a Proposed Joint Procedural Schedule.

We have worked out with the Consumer Advocate the attached Proposed Joint Procedural Schedule and would appreciate the Hearing Officer issuing the appropriate order encompassing this schedule with any modifications the Commission believes are necessary and appropriate; CGC and the Consumer Advocate would be happy to jointly talk with the Hearing Officer about our joint schedule if appropriate.

In addition, the Consumer Advocate and CGC have agreed that the issuance of a protective order is needed given the above referenced confidential information being provided. The Consumer Advocate and CGC have agreed that a Protective Order like the one issued in CGC's original ARM proceeding, Docket No. 19-00047, on October 16, 2019, would be appropriate

Again, let me thank all the TPUC Staff and Consumer Advocate staff for working with us in coordinating this filing process under the unique circumstances all of us are facing given the effects of the COVID-19 pandemic and as recognized in the Governor's Declared State of Emergency.

We are today providing the Consumer Advocate access to the filing via the share site. CGC will not object to their intervention in this matter, and we appreciate their joint agreement to the Proposed Procedural Schedule and Proposed Protective Order, and in facilitating this filing during this pandemic.

Finally, pursuant to your discussions with Carlinda Booher, and the filing guidelines given the State of Emergency, she will meet you later this afternoon with the filing in whatever additional format that you have requested.

Please do not hesitate to contact either Carlinda Booher, Floyd Self or me if you have any questions.

Sincerely,

Butler Snow LLP

A handwritten signature in blue ink, appearing to read "J.W. Luna", is centered on the page. The signature is fluid and cursive.

J.W. Luna

JWL/cb

Docket No. 20-00049  
 Chattanooga Gas Company  
 2020 ARM Filing for 2019 Historic Base Period

**Proposed Joint Hearing Schedule**

<b>Acvitivity</b>	<b>Due Date</b>
CGC ARM Petition, Testimony, Exhibits, Schedules per ARM Order:	Friday, May 29, 2020
* Meeting (Virtual) of Parties/Staff for Initial Discussions about CGC Case	Friday, June 5, 2020
Consumer Advocate/Intervenors First Discovery Requests	Friday, June 12, 2020
CGC Responses to First Discovery Requests	Tuesday, June 23, 2020
* Meeting (Virtual) of Parties/Staff for Q/A regarding responses/follow up	June 29-July 2, July 6 (TBD)
Consumer Advocate/Intervenors Second Discovery Requests	Wednesday, July 8, 2020
CGC Responses to Second Discovery Requests	Friday, July 15-17, 2020
* Meeting (Virtual or in Person?) of Parties/Staff for Follow-up Discussions	July 20-21, 2020
Consumer Advocate/Intervenors Pre-filed Direct Testimony	Tuesday, August 11, 2020
CGC Discovery Requests to Consumer Advocate/Intervenors	Friday, August 14, 2020
Consumer Advocate/Intervenors Responses to Discovery Requests	Thursday, August 20, 2020
CGC Pre-filed Rebuttal Testimony	Monday, August 24, 2020
Pre-hearing Conference	TBD
Target Hearing Date (assumes TPUC Conference Date)	Monday, September 14, 2020
* These are informal meetings to help resolve questions about the case to faciltiate discovery & advance the case	