

Moore & Van Allen

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### VIA UPS OVERNIGHT

January 20, 2006

The Honorable Ron Jones
Chairman
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243-0505

Re Nashville Gas Company, A Division of Piedmont Natural Gas Company, Inc – Docket No 05-00165

Dear Chairman Jones

Pursuant to the procedural schedule established in this proceeding and Tenn Comp R and Reg 1220-1-1-2-11, Nashville Gas Company respectfully submits a copy of the First Supplemental Response of Nashville Gas Company to the Consumer Advocate and Protection Division's First Set of Discovery Requests

Please accept this Response for filing and return a filed-stamped copy of this letter to me in the enclosed self-addressed and stamped envelope

Thank you for your assistance with this matter. If you have any questions regarding these comments you may reach me at the number shown above

Sincerely

James H Veffries IV

JHJ/bao

Enclosure

c All Parties of Record

## BEFORE THE TENNESSEE REGULATORY AUTHORITY NASHVILLE, TENNESSEE

January 20, 2006

IN RE	)		
REVIEW OF NASHVILLE GAS COMPANY'S IPA RELATING TO ASSET MANAGEMENT	)	DOCKET NO	05-00165
FEES	)		

FIRST SUPPLEMENTAL RESPONSE OF NASHVILLE GAS COMPANY, A DIVISION OF PIEDMONT NATURAL GAS COMPANY, INC, TO THE CONSUMER ADVOCATE AND PROTECTION DIVISION'S FIRST SET OF DISCOVERY REQUESTS

Nashville Gas Company, a Division of Piedmont Natural Gas Company, Inc ("Nashville Gas" or "Company"), pursuant to the Tennessee Regulatory Authority's November 28, 2005, *Order Establishing Procedural Schedule* and Tenn Comp R and Reg 1220-1-1-2-11, respectfully submits the following supplemental response to the Consumer Advocate and Protection Division's First Set of Discovery Requests

# NASHVILLE GAS COMPANY REVIEW OF NASHVILLE GAS COMPANY'S IPA RELATING TO ASSET MANAGEMENT FEES DOCKET NO 05-00165 CONSUMER ADVOCATE AND PROTECTION DIVISION FIRST DISCOVERY REQUESTS November 14, 2005

#### **DISCOVERY REQUEST NO 17**

Please identity and explain the amount of money expended by Nashville Gas Company for salaries and other expenses for the purpose of implementing, managing and monitoring the capacity management part of the incentive plan for the plan years that ended June 30, 2003, June 30, 2004, and June 30, 2005

SUPPLEMENTAL RESPONSE Total Expended for Area Code 3400 (Including Director-

Gas Supply & Wholesale Marketing)

Twelve Months Ended June 30, 2003 441.003

Twelve Months Ended June 30, 2004 466,070

Twelve Months Ended June 30, 2005 521,095

#### STATE OF NORTH CAROLINA

#### VERIFICATION

#### COUNTY OF MECKLENBURG

Bill R Morris, being duly sworn, deposes and says that he is Director of Financial Planning and Rates of Piedmont Natural Gas Company, Inc., that as such, he has read the foregoing Responses and knows the contents thereof, that the same are true of his own knowledge except as to those matters stated on information and belief and as to those he believes them to be true

Bill R. Morris

Bill R Morris

Sworn to and subscribed before me

this the 18 day of January, 2006

Notary Public

My Commission Expires

WAY COMMISSION EXPIRES 10-29-10

MY COMMISSION EXPIRES 10-29-10

#### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the First Supplemental Response of Nashville Gas Company, A Division of Piedmont Natural Gas Company, Inc., to the Consumer Advocate and Protection Division's First Set of Discovery Requests is being served upon the parties in this action either by hand delivery or by UPS overnight delivery addressed as follows

Bill R Mortis
Director of Financial Planning and Rates
Predmont Natural Gas Company, Inc
P O Box 33068
Charlotte, NC 28233

David Carpenter
Director – Rates
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Aaron Rochelle, Esq Tennessee Regulatory Authority 460 James Robertson Parkway Nashville, Tennessee 37243-0505

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Consumer Advocate and Protection Division
425 Fifth Avenue North
Nashville, Tennessee 37243

R Dale Grimes, Esq Bass, Berry & Sims PLC AmSouth Center 315 Deaderick Street, Suite 2700 Nashville, Tennessee 37238

This the 20th day of January, 2006

lames H. JAffries IV