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A PROFESSIONAL LIMITED LIABILITY COMPANY

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MEMPHIS

June 11, 2008

VIA HAND DELIVERY

Chairman Eddie Roberson, PhD c/o Ms. Sharla Dillon Tennessee Regulatory Authority 460 James Robertson Parkway Nashville, Tennessee 37243

> Petition to Intervene of Piedmont Natural Gas Company, Inc. Re:

> > Docket No. 08-00064

Dear Chairman Roberson:

Enclosed please find an original and sixteen copies of Piedmont Natural Gas Company, Inc.'s Petition to Intervene in the above docket, dated June 11, 2008. Also enclosed is our check for \$25.00 for your fee.

Please return three copies of this Petition to me, which I would appreciate your stamping as "filed," by way of our courier.

Should you have any questions concerning any of the enclosed, please do not hesitate to contact me.

With kindest regards, I remain

Very truly yours,
121 Haumes

R. Dale Grimes

Enclosures

cc:

Gary Hotvedt, Esq. (w/o enclosure)

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BEFORE THE TENNESSEE REGULATORY AUTHORITY NASHVILLE, TENNESSEE

In re:)	
)	
Generic Contested Case Docket to Analyze and)	DOCKET NO. 08-00064
Evaluate the Cost-Benefits and Funding)	
Mechanisms for Energy Conservation Research)	

PIEDMONT NATURAL GAS COMPANY, INC.'S PETITION TO INTERVENE

Piedmont Natural Gas Company, Inc. ("Piedmont") hereby petitions the Tennessee Regulatory Authority ("TRA") pursuant to Tenn. Code Ann. § 65-2-107, for permission to intervene and to be made a party of record in the above-captioned docket. In support of this petition, Piedmont alleges as follows:

- 1. Piedmont is incorporated under the laws of the state of North Carolina and is duly authorized by its Articles of Incorporation to engage in the business of transporting, distributing and selling natural gas. It is duly domesticated and is engaged in conducting the business abovementioned in the states of South Carolina, North Carolina and Tennessee. Piedmont is a public utility under the laws of this State, and its public utility operations in Tennessee are subject to the jurisdiction of the TRA.
- 2. Any notices or other communications with respect to this Petition should be sent to:

Jane Lewis-Raymond
Vice President & General Counsel
Piedmont Natural Gas Company, Inc.
Post Office Box 33068
Charlotte, NC 28233
Telephone: 704-731-4261

And

R. Dale Grimes
Bass, Berry & Sims, PLC
315 Deaderick Street, Suite 2700
Nashville, Tennessee 37238-3001
(615) 742-6244

And

James H. Jeffries IV Moore & Van Allen PLLC Bank of America Corporate Center 100 North Tryon Street, Suite 4700 Charlotte, North Carolina 28202-4003 Telephone: (704) 331-1079

- 3. The TRA has established this proceeding to analyze and evaluate the cost-benefits and funding mechanisms for energy conservation research.
- 4. The TRA has assigned Docket No. 08-00064 to the referenced matter and set a Status Conference for June 12, 2008.
- 5. Piedmont has a direct and material interest in the issues to be addressed by the TRA in this docket. This interest cannot be adequately represented by other parties to this proceeding.
- 6. Piedmont was unaware of the filing and status conference dates because the Notice of Status Conference did not show in the docket and Piedmont is not a party of record. Therefore, this petition is being filed out-of-time. Piedmont agrees to accept the record as it currently exists in this proceeding. Piedmont contends that its intervention at this time will not disrupt the proceeding and it will not prejudice any of the parties to these proceedings.
 - 7. Granting Piedmont's request to be made a party of record in the above-captioned

proceeding is in the public interest, is consistent with the policies of the TRA, and should be allowed so that a full and complete record can be developed.

WHEREFORE, Piedmont Natural Gas Company, Inc. prays for the following relief:

- 1. that this Petition to Intervene be granted by the TRA and that Piedmont be made a formal party of record to this proceeding; and
- that Piedmont be allowed to participate fully in this proceeding and to take such 2. positions as it deems advisable.

Respectfully submitted, this the 11th day of June 2008.

PIEDMONT NATURAL GAS COMPANY, INC.

R. Dale Grimes

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CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing has been forwarded via hand delivery to the following on this the 11th day of June, 2008:

J. W. Luna, Esq. Jennifer L. Brundige, Esq. 333 Union Street, Suite 300 Nashville, TN 37201

P. D. Juniones
R. Dale Grimes