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June 1, 2009

Via Hand-Delivery

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

filed electronically in docket office on 06/01/09

Re: Appropriateness of Implementation of PURPA Standard 5 (Energy Efficiencies) and Standard 6 (Rate Design Modification) for Piedmont Natural Gas Company, Chattanooga Gas Company and Atmos Energy Company
Docket No. 09-00065

Dear Chairman Roberson:

Enclosed please find an original and five (5) copies of a Petition to Intervene of Piedmont Natural Gas Company, Inc. for filing in the above referenced docket. This document also has been emailed to the TRA docket room and to counsel for interested parties.

Also enclosed is our check in the amount of \$25.00, payable to the Tennessee Regulatory Authority for the filing fee.

I would appreciate your stamping a copy of this petition as "filed," and returning it to me 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,



R. Dale Grimes

RDG/smb
Enclosures

Chairman Eddie Roberson

June 1, 2009

Page 2

cc: Hon. Sara Kyle
Hon. Mary W. Freeman
William T. Ramsey, Esq.
J.W. Luna, Esq.
Gary Hotvedt, Esq.
Richard Collier, Esq.

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**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

IN RE:)	
)	
APPROPRIATENESS OF)	
IMPLEMENTATION OF PURPA)	
STANDARD 5 (ENERGY EFFICIENCIES))	
AND STANDARD 6 (RATE DESIGN)	Docket No. 09-00065
MODIFICATION) FOR PIEDMONT)	
NATURAL GAS COMPANY,)	
CHATTANOOGA GAS COMPANY, AND)	
ATMOS ENERGY COMPANY)	

PETITION TO INTERVENE

Piedmont Natural Gas Company, Inc. ("Piedmont"), pursuant to Tennessee Code Annotated § 65-2-107 and Rule 1220-1-2-.08 of the Rules of the Tennessee Regulatory Authority, respectfully petitions the Authority to enter an order permitting Piedmont to intervene and participate in the above-captioned docket. In support of this Petition, Piedmont shows the Authority the following:

1. Any notices or other communications with respect to this Petition should be sent to :

R. Dale Grimes
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315 Deaderick Street, Suite 2700
Nashville, Tennessee 37238
Telephone: (615) 742-6244
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and

Ms. Pia Powers
Manager- Regulatory Affairs
Piedmont Natural Gas Company, Inc.
4720 Piedmont Row Drive
Charlotte, NC 28210
Pia.Powers@piedmontng.com

2. 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 above mentioned in the states of Tennessee, South Carolina, and North Carolina. Piedmont is a public utility under the laws of this State, and its public utility operations in Tennessee are subject to the jurisdiction of this Authority.

3. On May 27, 2009, the Authority issued a Notice of Status Conference in this docket, which has been opened for the purpose of considering matters as required by Section 1307 of the Energy Independence & Security Act of 2007 ("EISA 2007"). Section 532(b) of EISA 2007 requires each natural gas utility to integrate energy efficiency resources into the plans and planning processes of the natural gas utility and to adopt policies that establish energy efficiency as a priority resource in the plans and planning processes of the natural gas utility. Further, the rates allowed to be charged by a natural gas utility shall align utility incentives with the deployment of cost-effective energy efficiency.

4 Piedmont is a regulated natural gas public utility in Tennessee potentially subject to the requirements of Section 532 of EISA 2007. As such, Piedmont is a proper party to intervene in this docket as it is subject to any determinations to be made by the Authority herein with respect to the above mentioned matters and thus its legal rights, duties, privileges, immunities, or other legal interests may be determined in these proceedings.

5. Based on these facts, Piedmont has a valid and substantial interest in this proceeding. This interest cannot be adequately represented by other parties to this proceeding. Only by intervening and participating in this docket can Piedmont properly protect its interests.

WHEREFORE, based upon the foregoing, Piedmont respectfully requests that the Authority issue an order allowing it to intervene and fully participate in all proceedings in this docket.

Respectfully submitted,



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*Counsel for Petitioner
Piedmont Natural Gas Company, Inc.*

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by United States Mail, first class, postage prepaid, this 7 day of June, 2009, upon the following:

William T. Ramsey, Esq.
NEAL & HARWELL
150 Fourth Avenue North
Suite 2000
Nashville, TN 37219

J. W. Luna, Esq.
FARMER & LUNA, PLLC
333 Union Street
Suite 300
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R. Dale Grimes