

**IN THE TENNESSEE REGULATORY AUTHORITY
AT NASHVILLE, TENNESSEE**

IN RE:

**PIEDMONT NATURAL GAS COMPANY
INC.'S ACTUAL COST ADJUSTMENT
ACCOUNT FILING FOR THE TWELVE
MONTHS ENDED DECEMBER 31, 2008**

DOCKET NO. 09-00093

PETITION TO INTERVENE

Robert E. Cooper, Jr., Attorney General and Reporter for the State of Tennessee, by and through the Consumer Advocate and Protection Division of the Office of the Attorney General ("Consumer Advocate"), pursuant to Tenn. Code Ann. § 65-4-118, respectfully petitions the Tennessee Regulatory Authority ("TRA" or "Authority") to grant the Consumer Advocate's intervention into this proceeding on behalf of the public interest. For cause, Petitioner would show as follows:

1. The Consumer Advocate is authorized by Tenn. Code Ann. § 65-4-118 to represent the interests of Tennessee consumers of public utilities services by initiating and intervening as a party in proceedings before the Authority in accordance with the Uniform Administrative Procedures Act and Authority rules.

2. Piedmont Natural Gas Company, Inc. ("Piedmont") is a public utility regulated by the Authority and distributes natural gas to consumers located in Nashville and the remainder of Davidson County, as well as portions of the adjoining counties of Cheatham, Dickson, Robertson, Rutherford, Sumner, Trousdale, Williamson, and Wilson and in certain incorporated towns and cities located therein.

3. On July 1, 2009, Piedmont filed in the Authority an Actual Cost Adjustment Account ("ACA") for the twelve months ended December 31, 2008, for TRA review.

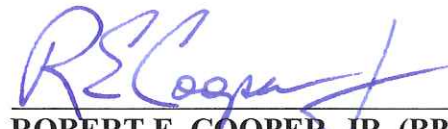
4. The TRA Audit Staff completed its audit of Piedmont's ACA on March 11, 2010. Piedmont responded to said report on March 30, 2010. Both the final audit and Piedmont's response were filed with the Authority on April 1, 2010.

5. On April 6, 2010, Piedmont filed a *Request for Declaratory Interpretation* of Service Schedule No. 316, Performance Incentive Plan, which was adopted as the result of a settlement agreement between Piedmont, the TRA, and the Consumer Advocate in TRA Docket No. 05-00165.

6. Only by participating in this proceeding can the Consumer Advocate ensure the interpretation sought by Piedmont is in the best interest of consumers.

WHEREFORE, Petitioner respectfully asks the Authority to grant the Petition to Intervene.

RESPECTFULLY SUBMITTED,



ROBERT E. COOPER, JR. (BPR #10934)
Attorney General and Reporter
State of Tennessee



MARY LEIGH WHITE (BPR #026659)
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Consumer Advocate and Protection Division
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Dated: May 5th, 2010.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Petition to Intervene was served via U.S. Mail or electronic mail upon:

James H. Jeffries IV, Esq.
Piedmont Natural Gas
Moore & Van Allen PLLC
100 North Tryon Street, Suite 4700
Charlotte, NC 28202

Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

This the 7th day of May, 2010.


MARY LEIGH WHITE