

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

IN RE:

**Petition of Piedmont Natural Gas Company,
Inc. for Approval of Service Schedule No.
317 and Related Energy Efficiency
Programs**

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DOCKET NO. 09-00104

**CONSUMER ADVOCATE'S MOTION TO REMOVE CONFIDENTIAL
DESIGNATION OF CERTAIN DOCUMENTS**

Robert E. Cooper, Jr., Attorney General and Reporter for the State of Tennessee, by and through the Consumer Advocate and Protection Division ("Consumer Advocate"), pursuant to TRA Rule 1220-1-2-.11(5) (a) and Paragraph 11 of the Protective Order entered in this Docket, hereby submits this Motion to Remove the Confidential Designation of certain materials provided by Piedmont Natural Gas Company, Inc. (Piedmont) during discovery. During the discovery process in this Docket, Piedmont has produced certain documents, calculations and other materials that they have designated as Confidential under the terms of the Protective Order in place in this matter. After having reviewed the materials so designated, the Consumer Advocate now requests that the Confidential Designation be removed from a small number of the many items labeled as Confidential by Piedmont in order that they may be used freely in the course of this proceeding and openly available to the public since they are not confidential under any state or federal law, regulation or rule.

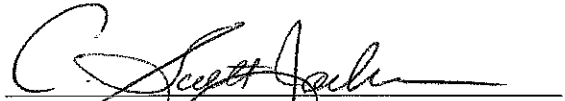
As outlined in the accompanying Memorandum in Support, the Consumer Advocate asks to have the Confidential Designation removed from following documents in this Docket:

- Responses to Discovery Requests 27, 28 and 29
- Response to Discovery Request 30
- Response to Discovery Request 35

A review of these documents shows that there is nothing of a proprietary or confidential nature in them. Furthermore, there is no law, rule or regulation which makes them confidential. The Public's interest in having access to these documents outweighs any need or desire by Piedmont to keep them as Confidential as is more fully explained in the Consumer Advocate's Memorandum in Support. Therefore, the Consumer Advocate respectfully requests that the Confidential Designation for those documents be removed and that they be available for use as non-confidential in this Docket.

Respectfully Submitted,

ROBERT E. COOPER, JR., (BPR#010934)
Attorney General and Reporter



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Dated: December 7th, 2009.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Motion was served via U.S.

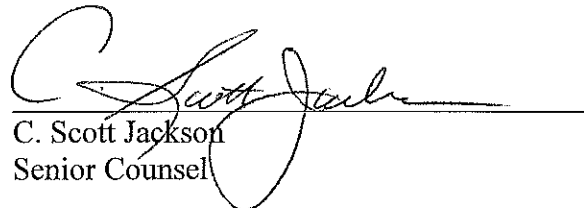
Mail or electronic mail upon:

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This the 17th day of December, 2009.


C. Scott Jackson
Senior Counsel