

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

IN RE:)	
)	
Petition of Piedmont Natural Gas Company,)	DOCKET NO. 09-00104
Inc. for Approval of Service Schedule No.)	
317 and Related Energy Efficiency)	
Programs)	

COMPLAINT AND 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 ("Authority") to convene a contested case and grant the Consumer Advocate's intervention into this proceeding on behalf of the public interest, because consumers may be adversely affected by the rate design changes requested by Piedmont Natural Gas Company, Inc. ("Piedmont"). 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 is a public utility regulated by the Authority and distributes natural gas to consumers in the State of Tennessee.

3. On July 16, 2009, Piedmont filed in the Authority a Petition for approval of a margin decoupling tracking mechanism with an effective date of September 1, 2009. Approval of the margin decoupling tracking mechanism may result in harm to consumers.

4. The Consumer Advocate alleges the design of the margin decoupling tracking mechanism is not in the public interest. Furthermore, this proceeding is not "appropriate" under the newly enacted Tenn. Code Ann. § 65-5-126 and constitutes single issue rate-making to the detriment of consumers.

5. Additional investigation and discovery will be needed to determine whether Piedmont's proposal is appropriate.

6. Only by participating in this proceeding can the Consumer Advocate work adequately to protect the interests of consumers.

WHEREFORE, Petitioner respectfully asks the Authority to convene a contested case proceeding and grant the Petition to Intervene.

RESPECTFULLY SUBMITTED,



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



Ryan L. McGehee (BPR #025559)
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Dated: July____, 2009.

CERTIFICATE OF SERVICE

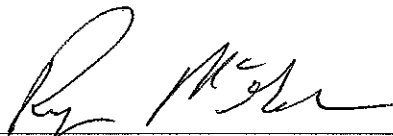
I hereby certify that a true and correct copy of the foregoing Petition to Intervene was served via U.S. Mail or electronic mail upon:

Jane Lewis-Raymond
Piedmont Natural Gas Company, Inc.
P.O. Box 33068
Charlotte, NC 28233

R. Dale Grimes
Bass, Berry & Sims PLC
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This the 31 day of July, 2009.



Ryan L. McGehee