

**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**

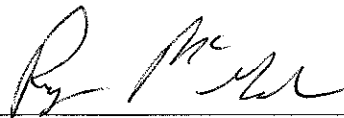
)
)
)
)
)
)

DOCKET NO. 09-00104

**CONSUMER ADVOCATE'S MOTION REQUESTING PERMISSION TO ISSUE MORE
THAN FORTY DISCOVERY REQUESTS TO PIEDMONT**

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), hereby submits this motion requesting permission to issue more than forty discovery requests to Piedmont Natural Gas Company, Inc. ("Piedmont" or "Company"). Pursuant to TRA Rule 1220-1-2-.11(5)(a), the Consumer Advocate seeks leave of the Hearing Officer by motion and has filed a memorandum establishing good cause for service of the additional discovery requests and the discovery request itself.

Respectfully Submitted,



RYAN L. MCGEHEE, BPR #025559
Assistant Attorney General
C. SCOTT JACKSON, BPR# 011005
Senior Counsel
Office of the Attorney General
Consumer Advocate and Protection Division
P.O. Box 20207
Nashville, Tennessee 37202-0207
Telephone: (615) 532-5512
Fax: (615) 532-2910

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:

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

R. Dale Grimes
Bass, Berry & Sims PLC
315 Deaderick Street, Suite 2700
Nashville, TN 37238-3001

James H. Jefferies IV
Moore & Van Allen PLLC
100 North Tryon Street, Suite 4700
Charlotte, NC 28202-4003

This the 17 day of October, 2009.



Ryan L. McGehee
Assistant Attorney General