

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

**IN RE:**

**APPLICATION OF PIEDMONT  
NATURAL GAS COMPANY, INC. FOR  
APPROVAL OF NEGOTIATED GAS  
REDELIVERY AGREEMENT WITH  
BRIDGESTONE/FIRESTONE**

**DOCKET NO. 10-00015**

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**PETITION TO INTERVENE**

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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, because consumers may be adversely affected by the negotiated Gas Redelivery Agreement ("Contract") between Piedmont Natural Gas Company, Inc. ("Piedmont") and Bridgestone Americas Tire Operations, LLC ("Bridgestone") and the rates set forth therein. 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 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.

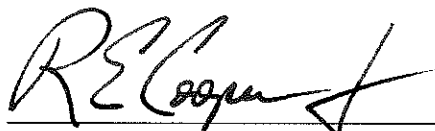
3. On February 1, 2010, Piedmont filed in the Authority an Application for approval of a negotiated Contract with Bridgestone.

5. Additional investigation and discovery may be needed to determine whether the Contract is reasonable in its terms and is in the best interest of Tennessee Consumers.

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 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)  
Assistant Attorney General  
Office of the Attorney General  
Consumer Advocate and Protection Division  
P.O. Box 20207  
Nashville, Tennessee 37202-0207  
(615) 741-4657

Dated: February 24<sup>th</sup>, 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:

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

Erin M. Everitt  
Bass, Berry & Sims PLC  
150 Third Avenue South, Suite 2800  
Nashville, TN 37201

This the 24<sup>th</sup> day of February, 2010.

  
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MARY LEIGH WHITE