

BASS

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April 19, 2010

VIA EMAIL AND HAND DELIVERY

Chairman Sara Kyle
c/o Ms. Sharla Dillon
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243

In Re: Generic Docket to Consider Modifying Notice Requirements for Rate Cases

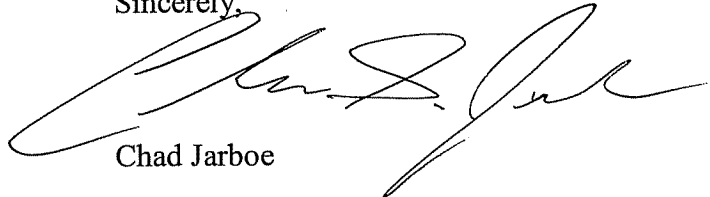
Docket No. 10-00040

Dear Chairman Kyle:

Enclosed please find an original and five (5) copies of the Comments of Piedmont Natural Gas Company, Inc. An electronic copy of the filing has also been transmitted via email to the Tennessee Regulatory Authority Docket Manager, Sharla Dillon. Please stamp one copy as "filed" and return to me by way of our courier.

Should you have any questions concerning any of the enclosed, please do not hesitate to contact me.

Sincerely,



Chad Jarboe

Enclosures

CJ:smb

cc: Vance Broemel, Esq.
A. Scott Ross, Esq.
Guy M. Hicks, Esq.
Jeanne W. Stockman, Esq.
William C. Bovender, Esq.
J.W. Luna, Esq.
Mr. Bruce H. Mottern

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

IN RE:)	
)	
GENERIC DOCKET TO CONSIDER)	
MODIFYING NOTICE REQUIREMENTS)	DOCKET NO. 10-00040
FOR RATE CASES)	

COMMENTS OF PIEDMONT NATURAL GAS COMPANY, INC.

Piedmont Natural Gas Company, Inc. ("Piedmont"), through counsel and pursuant to the Tennessee Regulatory Authority's March 22, 2010 Notice of Filing Comments, respectfully submits the following Comments regarding the issues set for consideration in this docket:

1. WHETHER TRA RULE 1220-4-1-.05 SHOULD BE AMENDED TO PROVIDE FOR ALTERNATE METHODS THAT A PUBLIC UTILITY CAN USE TO PROVIDE NOTICE TO CUSTOMERS OF A PROPOSED RATE INCREASE AND THE HEARING ADDRESSING THAT PROPOSED INCREASE.

Piedmont comment: TRA Rule 1220-4-1-.05 is sufficient as currently set forth. As prescribed by this Rule, Piedmont has used general circulation newspaper notice and notice at the utility's office to notify its customers of proposed rate increases and hearing information. While Piedmont does not necessarily oppose alternate methods, Piedmont believes that newspaper notices continue to provide sufficient notice to its customers. Further, Piedmont historically has not received any customer communications complaining of insufficient notice of rate increase proceedings.

2. WHETHER A PUBLIC UTILITY SHOULD EMPLOY A METHOD OF DIRECT CUSTOMER CONTACT, E.G. BILL INSERT, DIRECT MAIL NOTIFICATION, ETC., AS A MEANS OF PROVIDING NOTICE TO CUSTOMERS OF A PROPOSED RATE INCREASE.

Piedmont comment: Piedmont does not believe it necessary to amend the current Rule to provide for additional methods of customer contact such as bill inserts or direct mail

notifications. Piedmont believes that newspaper notice is sufficient for providing adequate notice to customers within its service territory.

3. WHETHER THERE SHOULD BE DIFFERENT NOTIFICATION REQUIREMENTS FOR DIFFERENT PUBLIC UTILITIES BASED ON THE TYPE OF SERVICE PROVIDED AND THE TYPE OF LOCALE(S) SERVED.

Piedmont comment: Piedmont has employed the methods indicated in TRA Rule 1220-4-1-.05 to provide notice to its customers of any proposed rate increases and related hearings. From Piedmont's perspective, the current Rule functions well to ensure proper notice is provided to customers within the Company's service territory.

4. WHETHER NOTIFICATION BY A PUBLIC UTILITY THROUGH NEWSPAPER(S) SHOULD CONTINUE TO BE THE PRINCIPAL MEANS OF NOTICE TO CUSTOMERS AND, IF SO, WHETHER THE DAYS OF PUBLICATION OF SUCH NOTICE SHOULD BE INCREASED BEYOND ONE DAY.

Piedmont comment: Notification through newspapers should continue to serve as the principal means of notice to customers of proposed rate increases and related hearings. Piedmont does not oppose the extension of the notice requirement beyond one day. However, Piedmont restates its position that the current TRA Rule 1220-4-1-.05 is sufficient as currently promulgated.

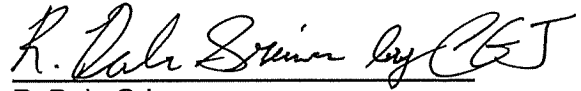
5. WHERE A PUBLIC UTILITY'S SERVICE TERRITORY IS IN A LOCALE THAT IS SEPARATE AND APART FROM A SIGNIFICANT-SIZED URBAN AREA, WHETHER THE PUBLIC UTILITY SHOULD PUBLISH NOTICE OF A PROPOSED RATE INCREASE IN A NEWSPAPER HAVING GENERAL CIRCULATION IN THE LOCALE.

Piedmont comment: As previously stated, Piedmont has provided notice of proposed rate increases to the customers within its service territory through published notice in a newspaper. Piedmont does not believe it necessary to amend TRA Rule 1220-4-1-.05 to differentiate between utilities depending upon locale within the State.

WHEREFORE, Piedmont Natural Gas Company, Inc., respectfully requests that the Authority accept its comments as set forth above.

Respectfully submitted this 19th day of April, 2010.

Piedmont Natural Gas Company, Inc.

Handwritten signature of R. Dale Grimes in cursive, followed by the initials "CGJ" in a stylized font.

R. Dale Grimes
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Handwritten signature of James H. Jeffries IV in cursive, followed by the initials "CGJ" in a stylized font.

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served via U.S. Mail, overnight delivery and/or electronic mail, on this the 19th day of April, 2010, upon the following:

<p><i>For the Consumer Advocate Division:</i> Vance Broemel, Esq. OFFICE OF THE ATTORNEY GENERAL CONSUMER ADVOCATE AND PROTECTION DIVISION 425 5th Avenue North, 2nd Floor Nashville, TN 37243</p> <p>email: Vance.Broemel@ag.tn.gov</p>	<p><i>For Kingsport Power Company:</i> William C. Bovender, Esq. HUNTER SMITH & DAVIS LLP P. O. Box 3740 Kingsport, TN 37664-0740</p> <p>email: bovender@hdsdlaw.com</p>
<p><i>For Atmos Energy:</i> A. Scott Ross, Esq. NEAL & HARWELL, PLC One Nashville Place, Suite 2000 150 Fourth Avenue North Nashville, TN 37219-2498</p> <p>email: sross@nealharwell.com</p>	<p><i>For Chattanooga Gas Company:</i> J. W. Luna, Esq. FARMER & LUNA, PLLC 333 Union Street, Suite 300 Nashville, TN 37201</p> <p>email: jwluna@farmerluna.ocm</p>
<p><i>For AT & T:</i> Guy M. Hicks, III, Esq. AT&T TENNESSEE Suite 2101, 333 Commerce Street Nashville, YN 37201-3300</p> <p>email: guy.hicks@att.com</p>	<p><i>For TDS Telecom, Inc.:</i> Mr. Bruce H. Mottern TDS TELECOM, INC. Suite 200 10025 Investment Way Knoxville, TN 37932</p> <p>email: bruce.mottern@tdstelecom.com</p>
<p><i>For CenturyLink:</i> Jeanne W. Stockman, Esq. CENTURYLINK 1411 Capital Boulevard MS: NCWKFR313 Wake Forest, NC 27587</p> <p>email: jeanne.w.stockman@embarq.com</p>	

Er. Dale Grinn by C.G.T.