

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

IN RE:

**APPLICATION OF PIEDMONT
NATURAL GAS COMPANY, INC.
FOR APPROVAL OF DEFERRED
ACCOUNTING TREATMENT FOR
FLOOD RESPONSE COSTS**

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DOCKET NO. 10-00185

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 ("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 Piedmont Natural Gas Company, Inc.'s Petition for Approval of Deferred Accounting Treatment for Flood Response Costs. 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 neighboring counties of Cheatham, Dickson, Robertson, Rutherford, Sumner, Trousdale, Williamson, and Wilson and in certain incorporated towns and cities located therein.


3. On September 9, 2010, Piedmont filed in the Authority a Petition for Approval of Deferred Accounting Treatment for Flood Response Costs associated with the May 2010 flooding in Nashville and Middle Tennessee.

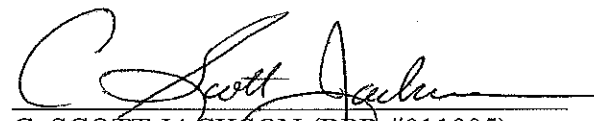
4. Additional investigation and discovery may be needed to determine whether the costs sought to be segregated into a regulatory asset deferred account are truly direct, incremental and non-recurring costs which are appropriate for such treatment.

5. 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 #010934)
Attorney General and Reporter
State of Tennessee


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
(615) 741-8726

Dated: September 22, 2010.

CERTIFICATE OF SERVICE

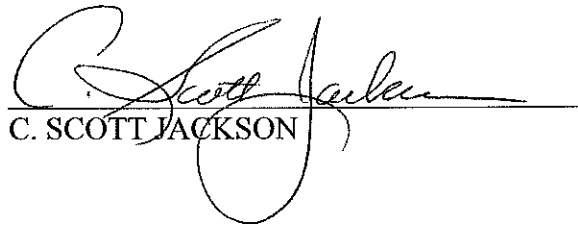
I hereby certify that a true and correct copy of the foregoing Petition to Intervene was served via U.S. Mail or electronic mail upon:

Jane Lewis-Raymond
Vice President & General Counsel
Piedmont Natural Gas Company, Inc.
P.O. Box 33068
Charlotte, NC 28233

R. Dale Grimes
Bass, Berry & Sims PLC
150 Third Avenue South, Suite 2800
Nashville, TN 37201

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

This the 22nd day of September, 2010.


C. SCOTT JACKSON