## IN THE TENNESSEE REGULATORY AUTHORITY NASHVILLE, TENNESSEE

IN RE:	)
	)
PETITION OF PIEDMONT NATURAL	)
GAS COMPANY, INC., for an	)
Adjustment to Its Rates, Approval of	
Changes to Its Rate Design, Amortization	) DOCKET NO. 11-00144
of Certain Deferred Assets, Approval of	
New Depreciation Rates, Approval of	)
Revised Tariffs and Service Regulations,	Filed Electronically in
and Approval of a New Energy Efficiency	TRA Docket Room
Program and GTI Funding	09/21/11

## 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 an Adjustment to Its Rates, Approval of Changes to Its Rate Design, Amortization of Certain Deferred Assets, Approval of New Depreciation Rates, Approval of Revised Tariffs and Service Regulations, and Approval of a New Energy Efficiency Program and GTI Funding. 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 2, 2011, Piedmont filed in the Authority a Petition for an

Adjustment to Its Rates, Approval of Changes to Its Rate Design, Amortization of Certain

Deferred Assets, Approval of New Depreciation Rates, Approval of Revised Tariffs and Service

Regulations, and Approval of a New Energy Efficiency Program and GTI Funding.

4. Piedmont is requesting a rate increase of \$16.7 million, an amount which may not

be just and reasonable and requires further investigation.

5. Piedmont is proposing a rate design with increased fixed service charges, funding

for natural gas technology research and development and an energy conservation program, all

which affect the interests of the Tennessee consumers served by Piedmont.

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 #010934)

Attorney General and Reporter

State of Tennessee

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RYAN L. MCGEHEE (BPR #25559)

Assistant Attorney General
Office of the Attorney General
Consumer Advocate and Protection Division
P.O. Box 20207

Nashville, Tennessee 37202-0207

(615) 532-5512

Dated: September  $\frac{21}{5}$ , 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  $7^{13^{2}}$  day of September, 2010.

RYAN L. MCGEHEE