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BERRY • SIMS_{PLC}

150 Third Avenue South, Suite 2800
Nashville, TN 37201
(615) 742-6200

David Killion
PHONE: (615) 742-7718
FAX: (615) 742-0414
E-MAIL: dkillion@bassberry.com

September 30, 2011

Filed electronically in
TRA Docket Room
09/30/11

VIA HAND DELIVERY

Chairman Kenneth C. Hill
c/o Sharla Dillon
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243

Re: ***Petition of Piedmont Natural Gas Company, Inc. Inc., 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, Docket No. 11-00144***

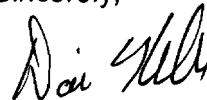
Dear Chairman Hill:

Enclosed please find an original and five (5) copies of Piedmont Natural Gas Company, Inc.'s Objections to the First Discovery Request of the Consumer Advocate and Protection Division.

This material is also being filed today by way of email to the Tennessee Regulatory Authority docket manager, Sharla Dillon. Please file the original and four copies of this material and stamp the additional copy as "filed." Then please return the stamped copy to me by way of our courier.

Should you have any questions concerning this matter, please do not hesitate to contact me at the email address or telephone number listed above.

Sincerely,



David Killion

Enclosures

Chairman Kenneth C. Hill
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cc: Mr. David Foster, Chief of Utilities Division (w/o enclosure)
Mr. Jerry Kettles, Chief of Economic Analysis & Policy Division (w/o enclosure)
Ryan McGehee, Esq. (w/ enclosure)
C. Scott Jackson, Esq. (w/ enclosure)

10105927.1

**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 of)	
Certain Deferred Assets,)	
Approval of New Depreciation)	DOCKET NO. 11-00144
Rates, Approval of Revised)	
Tariffs and Service Regulations,)	
and Approval of a New Energy)	
Efficiency Program and GTI)	
Funding)	

**PIEDMONT NATURAL GAS COMPANY, INC.'S OBJECTIONS TO FIRST
DISCOVERY REQUEST OF THE CONSUMER ADVOCATE AND PROTECTION
DIVISION**

Piedmont Natural Gas Company, Inc., ("Piedmont," or "Company"), through counsel, files these Objections to the First Discovery Request of the Consumer Advocate and Protection Division ("CAPD"). To assist the Hearing Officer in evaluating this matter, Piedmont is setting forth its objections in two parts. Part I sets forth general objections applicable to all requests and Part II sets forth objections to specific requests propounded by CAPD.

GENERAL OBJECTIONS

1. Piedmont objects generally to any definitions or instructions to the extent that they are inconsistent with and request information that is beyond the scope of the Tennessee Rules of Civil Procedure. Piedmont's responses will comply with the requirements of the Tennessee Rules of Civil Procedure.

2. Any requests for production of documents are interpreted to describe each item or category of items requested with reasonable particularity as required by Tenn. R. Civ. P. 34.02, and the terms used in the requests are not interpreted “broadly” as requested by the CAPD in the Preliminary Matters and Definitions. Piedmont will produce non-privileged, responsive items or data in its possession, custody or control as required by the Tennessee Rules of Civil Procedure.

3. Piedmont objects to the scope of the terms “identity” and “identify” as used by the CAPD. In particular, Piedmont objects to providing the date of birth, the current residential address, and the current residential telephone number of persons to be identified on the grounds that the scope of information requested is overly broad, unduly burdensome, and not calculated to lead to the discovery of admissible evidence. Piedmont further objects to the CAPD’s instructions to produce the “original” and “each copy” of each document requested on the grounds that the request is overly broad, unduly burdensome, and not calculated to lead to the discovery of admissible evidence. Piedmont intends to provide copies of original documents as available.

4. Piedmont further objects to the discovery requests to the extent they seek information or documents that are subject to any privilege, including the attorney-client privilege, attorney work product doctrine or any other protection from discovery.

5. Piedmont objects to the discovery requests to the extent they seek confidential or proprietary information. Piedmont will produce such information designated “Confidential” pursuant to the Protective Order.

6. Piedmont objects to the discovery requests as unduly burdensome to the extent they seek information that Piedmont has already provided to CAPD or that CAPD already has within its possession, custody or control.

7. Piedmont objects to the discovery requests to the extent they seek information or documents that are not in Piedmont's possession, custody or control.

8. Piedmont objects to the discovery requests to the extent they seek information related to states other than Tennessee. Unless otherwise specifically requested, Piedmont's responses to all discovery requests will relate solely to data applicable to Tennessee.

9. These General Objections are continuing and are incorporated by reference into Piedmont's responses to all discovery requests to the extent applicable. The statement of the following additional objections to specific discovery requests shall not constitute a waiver of these General Objections.

10. Without waiving any of these General Objections, Piedmont will respond to the CAPD's discovery requests by providing responsive, non-privileged information. Piedmont reserves its right to object to the use and admissibility of the information or documents at the hearing on the merits or at any other proceeding in this docket.

SPECIFIC OBJECTIONS

REQUEST NO. 9: Provide, in excel format, the Mission — Values — Performance (MVP) plan, the Annual Incentive Plan (AIP) and Long-Term Incentive Plan (LTIP) amounts included in Salary and Payroll expenses for the test year ended 5/31/11, by employee, by month. In addition, provide, in excel format, the MVP Plan, AIP Plan, and LTIP Plan amounts included in Salary and Payroll expenses for the years ended 5/31/2008, 5/31/2009, and 5/31/2010.

OBJECTION: Piedmont objects to the request for Piedmont's "Annual Incentive Plan (AIP)" as irrelevant and not calculated to lead to the production of admissible evidence because Piedmont does not have an Annual Incentive Plan. Subject to and without waiving its General or

Specific Objections, Piedmont will respond to this request by providing responsive, non-privileged information related to its MVP, LTIP and the STIP plans as discussed with the CAPD.

REQUEST NO. 13: Provide in excel format, the account and amount for any non-recurring charges, such as non jurisdictional expenses, outside service expenses, and outsourcing of costs for the twelve months ended 5/31/2011.

OBJECTION: Piedmont objects to this request to the extent that it seeks irrelevant information related to non-recurring charges which Piedmont did not include in its revenue request. Subject to and without waiving its General or Specific Objections, Piedmont will respond to this request by providing responsive, non-privileged information.

REQUEST NO. 15: Provide, in excel format, all of the lobbying expenses for the years ended 5/31/08, 5/31/09, 5/31/10.

OBJECTION: Piedmont objects to this request to the extent that it seeks information that is irrelevant and not calculated to lead to discovery of admissible evidence, as Piedmont did not include lobbying expenses in its revenue request.

REQUEST NO. 18: Provide, in excel format, the actual pension amount awarded by the TRA in Docket 03-00391.

OBJECTION: Piedmont objects on the grounds that this request seeks information that is irrelevant and not calculated to lead to the production of admissible evidence, as Piedmont was not a party to Docket 03-00391. Subject to and without waiving its General or Specific

Objections, Piedmont will respond to this request by providing responsive, non-privileged information related to Docket 03-00313 which Piedmont has discussed with the CAPD.

REQUEST NO. 21: Provide, in excel format, the accounts, dates, and payees for athletic events and social club expenses during the test year ended 5/31/11.

OBJECTION: Piedmont objects on the grounds that this request seeks information that is irrelevant and not calculated to lead to discovery of admissible evidence, as Piedmont did not include athletic events and social club expenses in its revenue request.

REQUEST NO. 22: Provide, in excel format, a listing of any expense equal to or greater than \$5000 paid to any vendor, for any expense, during the test year ended 5/31/2011. List the payee, account number, FERC account number, date, business reason, and amount. Indicate if the expense is recurring or non-recurring. Include Tennessee and Corporate Office items.

OBJECTION: Piedmont objects to this request on the grounds that in the ordinary course of Piedmont's business, Piedmont does not identify a "business reason" for each expense recorded on its books. Piedmont further objects to the extent that this request seeks information related to expenses not included in Piedmont's revenue request, which is irrelevant and not calculated to lead to discovery of admissible evidence. In addition, this request is unduly burdensome, as Piedmont has already provided the requested information to the CAPD in response to MFR #25.

REQUEST NO. 24: Provide, in excel format, the Operation and Maintenance expenses for the attrition year ended 2/28/13 in the format of MFR 42.

OBJECTION: Piedmont objects on the grounds that this request seeks information that is not within the possession, custody or control of Piedmont and would be unduly burdensome to produce. Piedmont does not calculate Operation and Maintenance expenses for the attrition period allocated by FERC account.

REQUEST NO. 27: Provide the unequalized ad valorem assessment amounts for Piedmont Natural Gas Company (Tennessee Operations) as of August 31, 2011 and August 31, 2010 and copies of all ad valorem tax bills paid before March 1, 2011.

OBJECTION: Piedmont objects on the grounds that this request seeks information that is irrelevant, overly broad, unduly burdensome and not calculated to lead to the discovery of admissible evidence in that it seeks copies of all ad valorem tax bills paid at any time before March 1, 2011. Subject to and without waiving its General or Specific Objections, Piedmont will respond to this request by providing the ad valorem tax bill paid immediately prior to March 1, 2011 as discussed with the CAPD.

REQUEST NO. 55: Referencing tariff "Service Schedule No. 312", the Company indicates more than one adjustment may be made annually to the EPP. Provide the number of EPP adjustments made since September 1, 2007.

OBJECTION: Piedmont does not adjust all accounts annually on the same date. Rather, Piedmont makes adjustments on an account-by-account basis. To respond to this request, Piedmont would be required to analyze thousands of accounts over a four year period to determine whether and when each adjustment was made. Piedmont accordingly objects on the grounds that this request seeks information that is unduly burdensome to produce.

RESPECTFULLY SUBMITTED,

Piedmont Natural Gas Company, Inc.

E. Dale Grimes

R. Dale Grimes (#006332)
C. David Killion (#026412)
Bass, Berry & Sims PLC
150 Third Avenue South, Suite 2800
Nashville, TN 37201
Telephone: 615-742-6244
dgrimes@bassberry.com

James H. Jeffries IV by (DLE w/ permission)

James H. Jeffries IV
Moore & Van Allen PLLC
100 North Tryon Street, Suite 4700
Charlotte, NC 28202-4003
Telephone: 704-331-1079
jimjeffries@mvalaw.com

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing document is being served this date
via U.S. Mail or electronic mail upon:

Ryan L. McGehee, Assistant Attorney General
C. Scott Jackson, Senior Counsel
Office of the Attorney General and Reporter
Consumer Advocate and Protection Division
Post Office Box 20207
Nashville, Tennessee 37202-0207
ryan.mcgehee@ag.tn.gov
scott.jackson@ag.tn.gov

Jane Lewis-Raymond
Senior Vice President and General Counsel
David Carpenter
Vice President – Regulatory Affairs, Rates and Budget Administration
Pia Powers
Manager – Regulatory Affairs
Piedmont Natural Gas Company, Inc.
Post Office Box 33068
Charlotte, North Carolina 28233
jane.lewis-raymond@piedmontng.com

This the 30th day of September, 2011.



C. David Killion