

BASS BERRY + SIMS_{PLC}

R. DALE GRIMES

TEL: (615) 742-6244
FAX: (615) 742-2744
dgrimes@bassberry.com

A PROFESSIONAL LIMITED LIABILITY COMPANY
ATTORNEYS AT LAW

150 THIRD AVENUE SOUTH, SUITE 2800
NASHVILLE, TN 37201
(615) 742-6200

www.bassberry.com

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April 14, 2015

RECEIVED

APR 16 2015

TN REGULATORY AUTHORITY
UTILITIES DIVISION

Via U.S. Mail
And Email

David Foster
Chief, Utilities Division
Tennessee Regulatory Authority
502 Deaderick Street, Fourth Floor
Nashville, Tennessee 37243

Re: *Petition of Piedmont Natural Gas, Inc. for Approval of an Integrity Management Rider to its Approved Rate Schedules and Service Regulations*
Docket No. 13-00118

Dear Mr. Foster:

Pursuant to the direction of Sharla Dillon, Clerk of the Tennessee Regulatory Authority, I have enclosed Piedmont Natural Gas Company's Integrity Management Monthly Report for the Month Ending February 28, 2015.

On December 18, 2013, the Authority approved Piedmont's Integrity Management Rider as proposed in Docket No. 13-00118. Paragraph 7 of Service Schedule 317 requires monthly reports to be filed within 45 days after the end of the month for which the report is being filed. This filing consists of various schedules constituting Piedmont's monthly report for the month ending February 28, 2015. This material will also be mailed to you via U.S. Mail..

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

With kindest regards, I remain

Very truly yours,

Rale Grimes mr

R. Dale Grimes

Enclosure

Cumulative Integrity Management Investment Amount

Actual Integrity Management Investment, by Integrity Project Type

		Current Vintage Year: Vintage Year 3			All Vintage Years
Line No.		February 2015 Capital Expenditure ¹	Prior Cumulative Capital Expenditure ²	Cumulative Capital Expenditure as of February 2015 ³	Cumulative Capital Expenditure as of February 2015 ⁶
<i>TN Direct</i>					
1	Corrosion Control	\$ 64,484.59	\$ 3,988.75	\$ 68,473.34	\$ 4,718,356.65
2	Casing Remediation	\$ 2,553.08	\$ 35,657.98	\$ 38,211.06	\$ 328,443.34
3	Distribution Integrity	\$ 823,948.87	\$ 2,534,887.77	\$ 3,358,836.64	\$ 14,027,317.05
4	Transmission Integrity	\$ 661,235.41	\$ 1,232,243.95	\$ 1,893,479.36	\$ 160,698,568.43
5	Total	\$ 1,552,221.95	\$ 3,806,778.45 ✓	\$ 5,359,000.40	\$ 179,772,685.47
<i>Joint Property: CO3-State</i>					
6	OASIS Project (Work & Asset Management System)	\$ 1,432,303.10	\$ 4,458,878.46	\$ 5,891,181.56	\$ 77,018,054.17
7	TN % of CO-3 for Current Month ⁴	18.07%			
8	Total Allocated to TN	\$ 258,817.17	\$ 805,719.34	\$ 1,064,536.51	\$ 13,831,810.14
9	Total Capital Expenditures [Line 5 + Line 8]	\$ 1,811,039.12	\$ 4,612,497.79	\$ 6,423,536.91	\$ 193,604,495.61
10	Less: Amount Included in the Attrition Period ⁵	\$ -	\$ -	\$ -	\$ 32,900,000.00
11	Total Integrity Management Investment	\$ 1,811,039.12	\$ 4,612,497.79 ✓	\$ 6,423,536.91	\$ 160,704,495.61

1/ Represents, for the current month, the actual Integrity Management Investment that is subject to this Rider

2/ Represents, as of the prior month, the cumulative Integrity Management Investment for the current Vintage Year that is subject to this Rider; this amount is shown in the prior month's report

3/ Represents, for the current Vintage Year through the current month, the cumulative Integrity Management Investment that is subject to this Rider

4/ Represents the TN% of Total Company Gas Plant Excluding Joint Property, which is updated annually

5/ Amount being recovered in existing base rates, per the Relevant Rate Order in Docket 11-00144

6/ Represents, for all Vintage Years through the current month, the cumulative Integrity Management Investment that is subject to this Rider. The cumulative Integrity Management Investment for Vintage Years 1 and 2, which captures amounts through 10/31/14, is \$154,280,958.71 (\$100,306,282.52 for Vintage Year 1 & \$53,974,676.19 for Vintage Year 2).

Detail of Current Month's Integrity Management Investment Amount
Actual Capital Investment for Current Month, by Capital Funding Project

Line No.	Capital Project Type	Funding Project Number	District	Funding Project Description	February 2015
1	CORR-Corrosion Control	FP1733548	17	Nashville Distribution Remediation	\$ 59.31
2	CORR-Corrosion Control	FP1733922	17	Nashville Bridge Attachments-New Co	\$ 64,425.28
3	CSNG-Casing & Remediation	FP1733739	17	Casing removal 2719,2738,2790,	\$ 2,553.08
4	DIMP-Distribution Integrity	FP1733753	17	3rd and Hart renewal-upgrade	\$ 589,447.78
5	DIMP-Distribution Integrity	FP1733755	17	Wheeler Ave	\$ 11,338.97
6	DIMP-Distribution Integrity	FP1733756	17	Foster Ave, Murfreesboro Rd to	\$ 39,797.90
7	DIMP-Distribution Integrity	FP1733757	17	Gallatin Pike @ Due West, Mad	\$ 2,042.34
8	DIMP-Distribution Integrity	FP1733759	17	Sunriser Ave & McCombs Ave	\$ 1,767.98
9	DIMP-Distribution Integrity	FP1733827	17	Elm Hill Pike Bridge Replaceme	\$ 58.58
10	DIMP-Distribution Integrity	FP1733931	17	Shelby Park RR Bridge Project	\$ 32,633.24
11	DIMP-Distribution Integrity	FP1733939	17	500 Lawrence St to Tenth St	\$ 109,797.92
12	DIMP-Distribution Integrity	FP1733945	17	Old Hickory Blvd. @ Logistics Way R	\$ 20,905.62
13	DIMP-Distribution Integrity	FP1733946	17	State Rte 45 Over Cumberland River	\$ 13,405.79
14	DIMP-Distribution Integrity	FP1733947	17	Nolensville Rd. Over RR S of I-440	\$ 2,640.59
15	DIMP-Distribution Integrity	FP1734027	17	Donelson St @ Robertson St	\$ 112.16
16	TIMP-Transmission Integrity	FP1733398	17	South Nashville 20"	\$ 49,928.28
17	TIMP-Transmission Integrity	FP1733747	17	White Bridge Road at Charlotte	\$ 587,271.94
18	TIMP-Transmission Integrity	FP1733929	17	White Bridge Road @ Post Rd. r	\$ 17,487.80
19	TIMP-Transmission Integrity	FP1733950	17	County Hospital Rd Station LNG	\$ 6,052.96
20	TIMP-Transmission Integrity	FP1734029	17	Line 310 Scheduled Digs	\$ 494.43
21	ISENP-Information Serv Enterprise	FP0026658	00	Work & Asset Management (OASIS)	\$ 1,432,303.10

25	Total (unallocated)	\$ 2,984,525.05
26	<i>subtotal: TN Direct (unallocated)</i>	<i>\$ 1,552,221.95 ✓</i>
27	<i>subtotal: CO-3 (unallocated)</i>	<i>\$ 1,432,303.10 ✓</i>
		\$ 2,984,525.05

Schedule Detailing the Integrity Management Deferred Account Adjustment Recorded for the Month
Calculation of the IM Deferred Account Balance
Amount Due From (To) Customers per GL Account No. 25351

<u>Line No.</u>			<u>Feb-15</u>
1	Beginning Balance	<i>Prior Month's IMR Report</i>	\$ (1,973,729.59)
2	IMR Revenue Recognition	<i>Prior Annual IMR Report</i>	3,218,665.45
3	(Collections from IM Adjustment)	<i>see Separate Schedule</i>	(3,750,806.64)
4	Ending Balance Before Interest	<i>sum Lines 1 thru 3</i>	(2,505,870.78)
5	Average Balance	<i>(Line 1 + Line 4) / 2</i>	(2,239,800.19)
6	Accrued Interest	<i>Line 5 * Line 9</i>	(6,065.38)
7	Ending Balance After Interest	<i>Line 4 + Line 6</i>	\$ (2,511,936.16)
8	Applicable Annual Interest Rate	<i>same as for ACA</i>	0.032500 ✓
9	Monthly Interest Rate	<i>Line 8 / 12</i>	0.002708 ✓
10	Actual GL #25351 EOM Balance	<i>per GL</i>	\$ (2,511,936.16)
11	Variance	<i>Line 7 - Line 10</i>	\$ -

Journal Entry: To Record Revenue

01 01 25351 3 17 6250 489	3,218,665.45
01 01 48010 3 17 6220 489	(1,919,740.82)
01 01 48110 3 17 6220 489	(1,004,642.05)
01 01 48120 3 17 6220 489	(43,001.37)
01 01 48300 3 17 6220 489	(901.23)
01 01 48900 3 17 6220 489	(250,379.98)
	-

Journal Entry: To Record Interest

01 01 25351 3 17 6250 626	(6,065.38)
01 01 43101 3 17 6220 626	6,065.38

Piedmont Natural Gas Company, Inc.
 Integrity Management Rider
 State of Tennessee

Schedule 4

General Ledger Support

Integrity Management Deferred Account Adjustment Recorded for the Month

Calculation of the IM Adjustment Collections:

		February - 2015		
<u>Line No.</u>		IM Adjustment (\$ per therm)	x Usage (therms)	= Collections (\$)
1	Residential (301)	0.09285	25,707,206	2,386,914.08
2	Small Commerical (302)	0.08111	11,245,581	912,129.07
3	Medium Commerical (352)	0.08111	2,941,984	238,624.32
4	Firm Lg General Sales (303)	0.03603	1,105,499	39,831.13
5	Firm Lg General Transportation (313)	0.03603	2,527,713	91,073.50
6	Firm Resale (310)	0.03603	-	-
7	Interruptible Lg General Sales (304)	0.00901	37,863	341.15
8	Interruptible Lg General Transportation (314)	0.00901	9,089,166	81,893.39
10	Total			\$ 3,750,806.64

Journal Entry: To Record Collections

01 01 48010 3 17 6220 489	2,386,914.08
01 01 48110 3 17 6220 489	912,129.07
01 01 48110 3 17 6220 489	238,624.32
01 01 48120 3 17 6220 489	39,831.13
01 01 48900 3 17 6220 489	91,073.50
01 01 48300 3 17 6220 489	-
01 01 48110 3 17 6220 489	341.15
01 01 48900 3 17 6220 489	81,893.39
01 01 25351 3 17 6250 489	(3,750,806.64)

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the attached documents were served upon the parties in this action by electronic mail and by depositing a copy of the same in the United States Mail, First Class Postage Prepaid, addressed as follows:

Emily Knight
Office of the Attorney General
Consumer Advocate and Protection Division
Post Office Box 20207
Nashville, Tennessee 37202
Emily.Knight@ag.tn.gov

This the 14th day of April, 2015.

Mike Grimes nt