#### BASS BERRY+SIMS...

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R. Dale Grimes dgrimes@bassberry.com

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November 30, 2015

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Via Hand-Deliverv

Executive Director Earl Taylor c/o Sharla Dillon Tennessee Regulatory Authority 502 Deaderick Street, Fourth Floor Nashville, Tennessee 37423

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

Dear Mr. Taylor:

Enclosed please find an original and five (5) copies of Piedmont Natural Gas Company Inc.'s ("Piedmont" or "Company") Integrity Management Rider ("IMR" or "Rider") mechanism annual filing and proposed annual rate adjustment pursuant to this Rider.

Under Piedmont's IMR mechanism, Service Schedule No. 317 as approved by the Authority Order on May 13, 2014, Piedmont will adjust its rates effective January 1<sup>st</sup> of each year in order to recover, on an intra-rate case basis, the costs associated with integrity management capital investment spending not reflected in Piedmont's base rates as of October 31<sup>st</sup> of the preceding year.

Piedmont's IMR requires that Piedmont submit an annual filing no later than November 30<sup>th</sup> of each year.

Piedmont hereby submits its 2015 annual filing which includes the following information in accordance with Service Schedule No. 317: (a) the monthly IMR filing for October 2015, (b) a schedule of all journal entries made related to this Rider for the previous 12 months, (c) billing determinants for the prior 12 months as used in the computation of the Deferred Account Adjustment, (d) capitalization policy effective for the prior 12 months, (e) the computation calculating the IMRR and all supporting schedules, (f) a schedule of any proposed prior period adjustments, and (g) a statement of whether the Company is aware of any changing conditions that may affect whether the rider is still in the public interest, including the identification of those factors.

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 and stamp the additional copies as "filed." Then please return the stamped copy to me by way of our courier.

With kindest regards, I remain

Very truly yours,

12. Marines

R. Dale Grimes

RDG:lgb Enclosures

cc: Pia Powers (Piedmont)
Bruce Barkley (Piedmont)

Sharla Dillon (via email) Emily Knight (CAD)

# Before the Tennessee Regulatory Authority

**Docket No. 13-00118** 

Petition of Piedmont Natural Gas Company, Inc. For Approval of an Integrity Management Rider to its Approved Rate Schedules and Service Regulations

**Integrity Management Rider** 

2015 Annual Filing



# Docket No. 13-00118 Integrity Management Rider October Monthly Report

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

### Cumulative Integrity Management Investment Amount Actual Integrity Management Investment, by Integrity Project Type

			Curre		 ul Vintage Years			
Line No.			October 2015 Capital Expenditure <sup>1</sup>		Prior Cumulative pital Expenditure <sup>2</sup>		Cumulative pital Expenditure of October 2015 <sup>3</sup>	Cumulative pital Expenditure of October 2015 <sup>6</sup>
1	TN Direct Corrosion Control	s	135,518.76	Ś	374,148.22	Ś	509,666.98	\$ 5,159,550.29
2	Casing Remediation	Ś	148,227.84	Š	268,367.12	Š	416,594.96	\$ 706,827.24
3	Distribution Integrity	Ś	653,608.17	Ś	7,688,885.71	\$	8,342,493.88	\$ 19,010,974.29
4	Transmission Integrity	Ś	311,775.17	\$	5,443,573.64	\$	5,755,348.81	\$ 164,560,437.88
5	Total	\$	1,249,129.94	\$	13,774,974.69	\$	15,024,104.63	\$ 189,437,789.70
	Joint Property: CO3-State							
6	OASIS Project (Work & Asset Management System)	\$	1,489,575.26	\$	17,424,600.01	\$	18,914,175.27	\$ 90,041,047.88
7	TN % of CO-3 for Current Month 4		18.07%					
8	Total Allocated to TN	\$	269,166.25	\$	3,148,625.21	\$	3,417,791.46	\$ 16,185,065.10
9	Total Capital Expenditures [Line 5 + Line 8]	\$	1,518,296.19	\$	16,923,599.90	\$	18,441,896.09	\$ 205,622,854.80
10	Less: Amount included in the Attrition Period <sup>5</sup>	\$				\$	-	\$ 32,900,000.00
11	Total Integrity Management Investment	\$	1,518,296.19	\$	16,923,599.90	\$	18,441,896.09	\$ 172,722,854.80

<sup>1/</sup> Represents, for the current month, the actual integrity Management investment that is subject to this Rider

<sup>2/</sup> 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

<sup>3/</sup> Represents, for the current Vintage Year through the current month, the cumulative integrity Management investment that is subject to this Rider

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

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

<sup>6/</sup> 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).

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

### <u>Detail of Current Month's Integrity Management Investment Amount</u> Actual Capital Investment for Current Month, by Capital Funding Project

		Funding Project			
Line No.	Capital Project Type	Number	District	Funding Project Description	October 2015
1	CORR-Corrosion Control	FP1733922	17	Nashville Bridge Attachments-New Co	135,518.76
2	CSNG-Casing & Remediation	FP1733739	17	Casing Removal 2719, 2738, 2790	82,558.26
3	CSNG-Casing & Remediation	FP1733743	17	Old Hickory Blvd. Casing#2766	65,669.58
4	DIMP-Distribution Integrity	FP1733765	17	McGavock Pike	4,593.43
5	DIMP-Distribution Integrity	FP1733762	17	Grandview Ave	44,780.77
6	DIMP-Distribution Integrity	FP1733761	17	Kline Ave.	13,354.95
7	DIMP-Distribution Integrity	FP1733760	17	Main St @ No 1st St	60,881.53
8	DIMP-Distribution Integrity	FP1733753	17	3rd and Hart renewal-upgrade	3,786.12
9	DIMP-Distribution Integrity	FP1734105	17	Anderson Ln	8,631.90
10	DIMP-Distribution Integrity	FP1733947	17	Nolensville Rd. Over RR S of I-440	9,073.55
11	DIMP-Distribution Integrity	FP1733946	17	State Rte 45 Over Cumberland River	43,661.23
12	DIMP-Distribution Integrity	FP1733945	17	Old Hickory Blvd. @ Logistics Way R	326,385.79
13	DIMP-Distribution Integrity	FP1733938	17	23rd Ave N @ Osage St	78,801.77
14	DIMP-Distribution Integrity	FP1733931	17	Shelby Park RR Bridge Project	59,657.13
15	TIMP-Transmission Integrity	FP1733398	17	South Nashville 20"	102,494.94
16	TIMP-Transmission Integrity	FP1733747	17	White Bridge Road at Charlotte	2,127.25
17	TIMP-Transmission Integrity	FP1733950	17	County Hospital Rd Station LNG	118,644.61
18	TIMP-Transmission Integrity	FP1733929	17	White Bridge Road @ Post Rd.	88,508.37
19	ISENP-Information Serv Enterprise	FP0026658	17	Work & Asset Management (OASIS)	\$ 1,489,575.26

2,738,705.20
1,249,129.94 1,489,575.26 2,738,705.20
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## 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

Line No.			Oct-15
1	Beginning Balance	Prior Month's IMR Report	\$ (2,712,513.28)
2	IMR Revenue Recognition	Prior Annual IMR Report	941,052.22
3	(Collections from IM Adjustment)	see Separate Schedule	(610,713.89)
4	Ending Balance Before Interest	sum Lines 1 thru 3	(2,382,174.95)
5	Average Balance	(Line 1 + Line 4) /2	(2,547,344.12)
6	Accrued Interest	Line 5 * Line 9	(6,898.21)
7	Ending Balance After Interest	Line 4 + Line 6	\$ (2,389,073.16)
8	Applicable Annual Interest Rate	same as for ACA	0.032500
9	Monthly Interest Rate	Line 8 / 12	0.002708
10	Actual GL #25351 EOM Balance	per GL	\$ -
11	Variance	Line 7 - Line 10	\$ (2,389,073.16)
lournal Fr	ntry: To Record Revenue		
300///di El	01 01 25351 3 17 6250 489		941,052.22
	01 01 48010 3 17 6220 489		(561,281.19)
	01 01 48110 3 17 6220 489		(293,730.63)
	01 01 48120 3 17 6220 489		(12,572.46)
	01 01 48300 3 17 6220 489		(263.49)
	01 01 48900 3 17 6220 489		(73,204.45)
			(0.00)
Journal Er	ntry: To Record Interest		/6.000.541
	01 01 25351 3 17 6250 626		(6,898.21)
	01 01 43101 3 17 6220 626		6,898.21

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

#### <u>General Ledger Support</u> <u>Integrity Management Deferred Account Adjustment Recorded for the Month</u>

Calculation of the IM Adjustment Collections:

				Oct - 2015		
		IM Adjustment		Usage		Collections
		(\$ per therm)	x	(therms)	=	(\$)
Line No.	_					
1	Residential (301)	0.09285		2,637,027		244,847.96
2	Small Commerical (302)	0.08111		2,218,312		179,927.29
3	Medium Commerical (352)	0.08111		651,665		52,856.55
4	Firm Lg General Sales (303)	0.03603		478,887		17,254.30
5	Firm Lg General Transportation (313)	0.03603		1,411,808		50,867.44
6	Firm Resale (310)	0.03603		21		0.76
7	Interruptible Lg General Sales (304)	0.00901		22,371		201.56
8	Interruptible Lg General Transportation (314)	0.00901		7,187,351		64,758.03
10	Total				-	\$ 610,713.89

Journal Entry: To Record Collections	
01 01 48010 3 17 6220 489	244,847.96
01 01 48110 3 17 6220 489	179,927.29
01 01 48110 3 17 6220 489	52,856.55
01 01 48120 3 17 6220 489	17,254.30
01 01 48900 3 17 6220 489	50,867.44
01 01 48300 3 17 6220 489	0.76
01 01 48110 3 17 6220 489	201.56
01 01 48900 3 17 6220 489	64,758.03
01 01 25351 3 17 6250 489	(610,713.89)

# Docket No. 13-00118 Integrity Management Rider Billing Rates

PIEDMONT NATURAL GAS COMPANY, INC. Tennessee Service Territory Billing Rates Effective:

January 1, 2018

Rate Schedule	Description	Tariff Rate Approved in Docket No. 11-00144	Cumuletiv	re PGACommodity	Current Refund	Current A	CACommodity	Current IPA	Current IM Adjustment	Total Adj. Factor (Sum Col.2 thru Col.7)	Proposed Billing Rate (Col.1+Col.8
		<1>	< <b>?&gt;</b>	❖	44>	<5a>	<6b>	<₽	<7>	<	<₽
Residential 301 301	Monthly Charge-NovMar. Monthly Charge-AprOct. Nov Mar. per TH Apr Oct. per TH	\$17.45 \$13.45 0.32000 0.27000	0.07577 0.07577	0.22575 0.22575	0.00000	(0.01113) (0.01113)	(0.00078) (0.00078)	0.00845 0.00645	0.10144 0.10144	0.39752 0.39752	\$17. \$13. 0.717 0.667
Small General 302 302	Monthly Charge Nov Mar. per TH Apr Oct. per TH	\$44,00 0,35400 0,30000	0.07577 0.07 <del>5</del> 77	0.22575 0.22578	0.00000	(0.01113) (0.01113)	(0.00076) (0.00076)	0.00645 0.00845	0.08861 0.08861	0.38459 0.38469	\$44. 0,738 0,684
Medium General 352 352	Monthly Charge Nov Mar, per TH Apr Oct. per TH	\$225.00 0.35400 0.30000	0.07577 0.07577	0.22576 0.22576	0,00000	(0.01113) (0.01113)	(0.00076) (0.00076)	0.00845 0.00645	0.08861 0.06861	0.38469 0.38469	\$225.0 0.7386 0.6846
Experimental Motor Vehicle Fuel 343 343	Monthly Charge Nov Mar. per TH Apr Oct. per TH		vari	es by customer p	er their correspon	nding rate achedule nding rate schedule nding rate schedule					
303 Firm General Sales	Monthly Charge Demand Charge per TH First 15,000 TH/ITH Next 25,000 TH/ITH Next 50,000 TH/ITH Over 90,000 TH/ITH	\$800,00 0,80000 0,09682 0,08953 0,05450 0,02784	0.82829	0.22575 0.22575 0.22575 0.22575	0.00000 0.00000 0.00000 0.00000	(0.19648)	(0.00076) (0.00076) (0.00076) (0.00076)	0.00845 0.00845 0.00645 0.00645	0.03938 0.03938 0.03938 0.03938	0.63181 0.27080 0.27080 0.27080 0.27080	\$800. 1,431 0,367 0,360 0,335 0,298
304 Interruptible General Sales	Monthly Charge First 15,000 TH/TH Next 25,000 TH/TH Next 50,000 TH/TH Over 90,000 TH/TH	\$800,00 0,09682 0,09963 0,08450 0,02784		0.22575 0.22575 0.22575 0.22575	0.00000 0.00000 0.00000 0.00000		(0.00076) (0.00076) (0.00076) (0.00076)	0.00645 0.00645 0.00645 0.00645	0.00984 0.00984 0.00984 0.00984	0.24128 0.24128 0.24128 0.24128	\$800. 0.338 0.330 0.305 0.268
313: Firm Transportation	Monthly Charge Demand Charge per TH First 15,000 TH/ITH Hoad 25,000 TH/ITH Next 50,000 TH/ITH Over 90,000 TH/ITH	\$800,00 0,80000 0,09682 0,08953 0,06450 0,02784	0,82629		0.00000 0.00000 0.00000 0.00000	(0.19648)			0.03938 0.03938 0.03938 0.03938	0.63181 0.03636 0.03636 0.03636 0.03636	\$800.1 1,431 0,136 0,128 0,103 0,087
314 Interruptible Transportation	Monthly Charge First 15,000 TH/TH Next 26,000 TH/TH Next 50,000 TH/TH Over 90,000 TH/TH	\$800.00 0.09882 0.08953 0.08460 0.02784			0.00000 0.00000 0.00000				0.00984 0.00984 0.00984 0.00984	0.00984 0.00984 0.00984 0.00984	\$800.0 0.1086 0.0993 0.0745
310 Resale Service	Demend Charge per TH Commodity Charge	0.80000	0,82829	0.22575	0.00000	(0,19648)	(0.00075)	0.00845	0.03936	0.63181	1.4318

<sup>1)</sup> In accordance with the Tennessee Public Service Commission order in Docket U-7074 customers metered inside Davidson County are required to pay an additional 6.49% for collection of the Metro Franchise Fee. Customers served by the Franklin and Notensville systems are required to pay 3%. Non-residential customers on the Ashland City system are required to pay 5%.

# Docket No. 13-00118 Integrity Management Rider Annual Report

Schedule of Journal Entries Related to the Interior Identification Technology Technology Technology (Identification of the Interior Identification of the IM Deferred Account Adjustment Calculation of the IM Deferred Account Identification Iden

Une No.			Hoy:15	Dec-14	<u> 10-15</u>	Feb-35	Mer-15	Apr.15	Mev:15	MO:15	Aut-15	Aug-15	\$ep-15	Oct-15
1 2 3	Beginning Balance (MR Revenue Recognition (Collections from IM Adjustment)	Prior Month's IMR Report Prior Annual IMR Report see Separate Schedule	\$ (2,314,670.07) \$ 1,137,529.12 (1,130,712.56)	(2,314,112,41) \$ 1,810,932,89 (2,082,105,07)	(2,541,850,87) \$ 3,382,341,97 (2,808,114,86)	(1,573,729.53) \$ 3,218,665.45 (3,750,808.64)	(2,511,836.16) \$ 2,450,328.85 (3,684,585.39)	(3,774,703,30) \$ 1,570,515,47 (1,455,321,76)	[3,667,568.80] \$ 994,337.01 (702,919.29)	(3,365,688.28) \$ 704,102.12 (533,834.38)	(3,224,454.58) \$ 655,584.18 (498,413.11)	(3,076,807.89) \$ 660,709.25 (461,608.23)	(2,885,765.28) \$ 661,401.25 (480,575.42)	(2,712,513,26) 941,052,22 (610,713.86)
4	Ending Balance Before Interest Average Balance	sum Lines 1 thru 3 (Line 1 + Line 4)/2	(2,307,853.51) (2,311,261.79)	(2,535,284.79) (7,474,698.60)	(1,967,623.76) (2,254,727.32)	(2,505,870.78) (2,229,800.18)	(3,766,202,70) (3,380,069,43)	(3,637,505.39) (3,716.104.45)	(3,376,151.06) (3,521.859.94)	(3.215,520.54) (3.300,604.41)	(3,068,287.51) (3,146,373.05)	(2,877,706.87) (3,977,257.38)	(2,704,943,45) (2,795,356,37)	(2,362,174,95) (2,547,344,12)
6	Accrued Interest	Line 5 * Line 9	(6,258.90)	(6,566.08)	(5,305.83)	(6,065.38)	(8,500.60)	(10,063.21)	(9,337.20)	(8,998.04)	(8,520.38)	(8,062.41)	(7,569.83)	(6,856.21)
7	Ending Belance After Interest	Line 4 + Line 6	\$ (2,314,112.41) \$	(2,541,850.87) \$	(1,973,729.59) \$	(2511,986.16) \$	(3,774,709.30) \$	(3,667,568.80) \$	(3,385,688.28) \$	(3,224,458.58) \$	(3,076,807,89) \$	(2,885,769.28) \$	(2,712,513.28) \$	(2,389,073.15)
<b>8</b> 9	Applicable Annual Interest Rate Monthly Interest Rate	same as for ACA Line 8 / 12	0,032500 0.002708	0.082500 0.002708	0.03250D 0.002708	0.032500 0.002708	0.032500 0.002708	0.092580 0.002708	0.032500 0.002708	0.032500 0.002708	0.032500 0.002708	0.032500 0.002708	0.002708	0.032500 0.002708
17 10	Actual GL #25351 FOM Belance Variance	per GL Line 7 - Line 10	\$ (2.314,112.41) \$ - \$	(2,541,850,87) \$	(1,973,729.59) \$	(2,513,936.16) \$ - \$	(3,774,703.30) \$	(3,867,568.80) \$ . \$	(3,385,688.28) \$ - \$	(3,224,458.58) \$ - \$	(3,076,807,89) \$	(2,805,769.28) \$ · \$	(2,712.513.2M) \$ - \$	(2,389,073.16)
Journal Ex	try: To Record Revenue													
	01 01 25351 3 17 6250 489 01 01 48090 3 17 6220 489 01 01 48110 3 17 6220 489 01 01 48120 3 17 6220 489 01 01 48300 3 17 6220 489 01 01 48300 3 17 6220 489		1,137,529.12 (678,467.87) (255,056.96) (15,197.39) (318.51) (88,488.39)	1,810,932.69 (1,080,112.69) (563,246.42) (24,194.06) (507.06) (140,872.46)	3,382,341.97 (2,017,364.05) (1,055,730.39) (45,128.09) (947.06) (263.112,38)	3,218,663.45 (1,918,740.82) (1,004,642.05) (49,001,87) (901,23) (250,878,96)	2,430,528,85 (1,449,545,35) (758,578,54) (32,469,19) (680,49) (189,055,28)	1,570,519.47 (936,720.63) (490,206.24) (20,882.14) (439.75) (122,170,71)	994,337.01 (589,062.37) (310,362.41) (13,284.34) (278.41] (77,349.48)	704, 102.12 (419,954.67) (219,771.40) (9,406.80) (197.15) (54,772.10)	655,584,18 (391,016.63) (204,627,50) (8,758,50) (183,56) (50,997,59)	660,709.25 (394,073.42) (206,227.18) (8,827.08) (185.00) (51,186.57)	661.401.25 (394.486.16) (206.443.17) (8.686.32) (185.19) (51.486.41)	941,052.22 (561,281.19) (291,730.63) (12,572.46) (262.49) (73,204.45)
laurani fi	try: To Record Interest		,,_,	,	-	*			,,,,,,,,,,,		,	,	· ·	(0.00)
JOHN E	O1 01 25851 8 17 6250 626 O1 01 43101 3 17 6250 626		 (6,258.90) 6,258.90	(6,566.0E) 6,566.0E	(6, 105.83) 6,105.83	(5,065,38) 6,065,38	(8,500.60) 8,500.60	(10,063.21) 10,063.21	(9,537.20) 9,537.20	(6,938,04) 8,938.04	(8,520.34) 8,520.38	(8,062.41) 8,062.41	(7,569.83) 7,569.83	(6,898.21) 6,898.21

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Schedule of Journal Entries Related to the Integrity Management Rider for the Previous Twelve Months (November 2014 thru October 2015)
General Ledger Support: Integrity Management Deferred Account Adjustment
Billing Determinants & Collections from the Integrity Management Adjustment By Month

		October - 2015					
		IM Adjustment		Usage		Collections	
		(\$ per therm)	x	(therms)	=	(\$)	
Line No.							
1	Residential (301)	0.09285		2,637,027		244,847.96	
2	Small Commerical (302)	0.08111		2,218,312		179,927.29	
3	Medium Commerical (352)	0.08111		651,665		52,856.55	
4	Firm Lg General Sales (303)	0.03603		478,887		17,254.30	
5	Firm Lg General Transportation (313)	0.03603		1,411,808		50,867.44	
6	Firm Resale (310)	0.03603		21		0.76	
7	Interruptible Lg General Sales (304)	0.00901		22,371		201.56	
8	Interruptible Lg General Transportation (314)	0.00901		7,187,351		64,758.03	
10	Total					\$ 610,713.89	

Journal Entry: To Record Collections	
01 01 48010 3 17 6220 489	244,847.96
01 01 48110 3 17 6220 489	179,927.29
01 01 48110 3 17 6220 489	52,856.55
01 01 48120 3 17 6220 489	17,254.30
01 01 48900 3 17 6220 489	50,867.44
01 01 48300 3 17 6220 489	0.76
01 01 48110 3 17 6220 489	201.56
01 01 48900 3 17 6220 489	64,758.03
01 01 25351 3 17 6250 489	(610,713.89)

2015 IMR Annual Report Schedule 2 Page 1a

Schedule of Journal Entries Related to the Integrity Management Rider for the Previous Tweive Months (November 2014 thru October 2015)

General Ledger Support: Integrity Management Deferred Account Adjustment

Billing Determinants & Collections from the Integrity Management Adjustment By Month

		September - 2015					
		IM Adjustment	IM Adjustment Usage				
		(\$ per therm)	×	(therms)	=	(\$)	
Line No.	_						
1	Residential (301)	0.09285		1,875,800		174,168.03	
2	Small Commerical (302)	0.08111		1,785,101		144,789.54	
3	Medium Commerical (352)	0.08111		513,008		41,610.08	
4	Firm Lg General Sales (303)	0.03603		390,064		14,054.01	
5	Firm Lg General Transportation (313)	0.03603		1,247,698		44,954.56	
6	Firm Resale (310)	0.03603		-		-	
7	Interruptible Lg General Sales (304)	0.00901		16,145		145.47	
8	Interruptible Lg General Transportation (314)	0.00901		6,754,020		60,853.73	
10	Total					\$ 480,575.42	

Journal Entry: To Record Collections	
01 01 48010 3 17 6220 489	174,168.03
01 01 48110 3 17 6220 489	144,789.54
01 01 48110 3 17 6220 489	41,610.08
01 01 48120 3 17 6220 489	14,054.01
01 01 48900 3 17 6220 489	44,954.56
01 01 48300 3 17 6220 489	•
01 01 48110 3 17 6220 489	145.47
01 01 48900 3 17 6220 489	60,853.73
01 01 25351 3 17 6250 489	(480,575.42)

2015 IMR Annual Report Schedule 2 Page 1b

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Schedule of Journal Entries Related to the Integrity Management Rider for the Previous Twelve Months (November 2014 thru October 2015)
General Ledger Support: Integrity Management Deferred Account Adjustment
Billing Determinants & Collections from the Integrity Management Adjustment By Month

		August - 2015				
		IM Adjustment		Usage		Collections
		(\$ per therm)	×	(therms)	=	(\$)
Line No.	<u>.</u>					
1	Residential (301)	0.09285		1,732,161		160,831.15
2	Small Commerical (302)	0.08111		1,795,963		145,670.56
3	Medium Commerical (352)	0.08111		460,297		37,334.69
4	Firm Lg General Sales (303)	0.03603		402,407		14,498.72
5	Firm Lg General Transportation (313)	0.03603		1,137,184		40,972.74
6	Firm Resale (310)	0.03603		<u></u>		-
7	Interruptible Lg General Sales (304)	0.00901		17,849		160.82
8	Interruptible Lg General Transportation (314)	0.00901		6,896,731		62,139.55
10	Total					\$ 461,608.23

Journal Entry: To Record Collections	
01 01 48010 3 17 6220 489	160,831.15
01 01 48110 3 17 6220 489	145,670.56
01 01 48110 3 17 6220 489	37,334.69
01 01 48120 3 17 6220 489	14,498.72
01 01 48900 3 17 6220 489	40,972.74
01 01 48300 3 17 6220 489	•
01 01 48110 3 17 6220 489	160.82
01 01 48900 3 17 6220 489	62,139.55
01 01 25351 3 17 6250 489	(461,608.23)

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Schedule of Journal Entries Related to the Integrity Management Rider for the Previous Twelve Months (November 2014 thru October 2015)

General Ledger Support: Integrity Management Deferred Account Adjustment

Billing Determinants & Collections from the Integrity Management Adjustment By Month

		July - 2015				
		IM Adjustment		Usage		Collections
		(\$ per therm)	x	(therms)	=	(\$)
Line No.						
1	Residential (301)	0.09285		2,004,384		186,107.05
2	Small Commerical (302)	0.08111		1,949,581		158,130.51
3	Medium Commerical (352)	0.08111		521,087		42,265.37
4	Firm Lg General Sales (303)	0.03603		387,723		13,969.66
5	Firm Lg General Transportation (313)	0.03603		1,083,744		39,047.30
6	Firm Resale (310)	0.03603		-		•
7	Interruptible Lg General Sales (304)	0.00901		641		5.78
8	Interruptible Lg General Transportation (314)	0.00901		6,646,775		59,887.44
10	Total					\$ 499,413.11

Journal Entry: To Record Collections	
01 01 48010 3 17 6220 489	186,107.05
01 01 48110 3 17 6220 489	158,130.51
01 01 48110 3 17 6220 489	42,265.37
01 01 48120 3 17 6220 489	13,969.66
01 01 48900 3 17 6220 489	39,047.30
01 01 48300 3 17 6220 489	•
01 01 48110 3 17 6220 489	5.78
01 01 48900 3 17 6220 489	59,887.44
01 01 25351 3 17 6250 489	(499,413.11)

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Schedule of Journal Entries Related to the Integrity Management Rider for the Previous Twelve Months (November 2014 thru October 2015)
General Ledger Support: Integrity Management Deferred Account Adjustment
Billing Determinants & Collections from the Integrity Management Adjustment By Month

		June - 2015				
		iM Adjustment		Usage		Collections
		(\$ per therm)	×	(therms)	=	(\$)
Line No.	<b>-</b>					
1	Residential (301)	0.09285		2,340,039		217,272.62
2	Small Commerical (302)	0.08111		1,953,938		158,483.91
3	Medium Commerical (352)	0.08111		564,364		45,775.56
4	Firm Lg General Sales (303)	0.03603		385,446		13,887.62
5	Firm Lg General Transportation (313)	0.03603		1,115,487		40,191.00
6	Firm Resale (310)	0.03603		-		-
7	Interruptible Lg General Sales (304)	0.00901		5,132		46.24
8	Interruptible Lg General Transportation (314)	0.00901		6,468,083		58,277.43
10	Total					\$ 533,934.38

Journal Entry: To Record Collections	
01 01 48010 3 17 6220 489	217,272.62
01 01 48110 3 17 6220 489	158,483.91
01 01 48110 3 17 6220 489	45,775.56
01 01 48120 3 17 6220 489	13,887.62
01 01 48900 3 17 6220 489	40,191.00
01 01 48300 3 17 6220 489	•
01 01 48110 3 17 6220 489	46.24
01 01 48900 3 17 6220 489	58,277.43
01 01 25351 3 17 6250 489	(533,934.38)

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Schedule of Journal Entries Related to the Integrity Management Rider for the Previous Twelve Months (November 2014 thru October 2015)

General Ledger Support: Integrity Management Deferred Account Adjustment

Billing Determinants & Collections from the Integrity Management Adjustment By Month

		May - 2015				
		IM Adjustment		Usage		Collections
		(\$ per therm)	x	(therms)	=	(\$)
Line No.	_					
1	Residential (301)	0.09285		3,598,743		334,143.29
2	Small Commerical (302)	0.08111		2,461,193		199,627.36
3	Medium Commerical (352)	0.08111		655,376		53,157.55
4	Firm Lg General Sales (303)	0.03603		401,669		14,472.13
5	Firm Lg General Transportation (313)	0.03603		1,182,880		42,619.17
6	Firm Resale (310)	0.03603		-		
7	Interruptible Lg General Sales (304)	0.00901		3,534		31.84
8	Interruptible Lg General Transportation (314)	0.00901		6,533,624		58,867.95
10	Total					\$ 702,919.29

Journal Entry: To Record Collections	
01 01 48010 3 17 6220 489	334,143.29
01 01 48110 3 17 6220 489	199,627.36
01 01 48110 3 17 6220 489	53,157.55
01 01 48120 3 17 6220 489	14,472.13
01 01 48900 3 17 6220 489	42,619.17
01 01 48300 3 17 6220 489	-
01 01 48110 3 17 6220 489	31.84
01 01 48900 3 17 6220 489	58,867.95
01 01 25351 3 17 6250 489	(702,919.29)

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Schedule of Journal Entries Related to the Integrity Management Rider for the Previous Twelve Months (November 2014 thru October 2015)
General Ledger Support: Integrity Management Deferred Account Adjustment
Billing Determinants & Collections from the Integrity Management Adjustment By Month

		April - 2015				
		IM Adjustment		Usage		Collections
		(\$ per therm)	×	(therms)	=	(\$)
Line No.	_					
1	Residential (301)	0.09285		9,158,282		850,346.48
2	Small Commerical (302)	0.08111		4,462,471		361,951.02
3	Medium Commerical (352)	0.08111		1,320,938		107,141.28
4	Firm Lg General Sales (303)	0.03603		523,627		18,866.28
5	Firm Lg General Transportation (313)	0.03603		1,376,005		49,577.46
6	Firm Resale (310)	0.03603		-		-
7	Interruptible Lg General Sales (304)	0.00901		13,637		122.87
8	Interruptible Lg General Transportation (314)	0.00901		7,249,320		65,316.37
10	Total					\$ 1,453,321.76

Journal Entry: To Record Collections	
01 01 48010 3 17 6220 489	850,346.48
01 01 48110 3 17 6220 489	361,951.02
01 01 48110 3 17 6220 489	107,141.28
01 01 48120 3 17 6220 489	18,866.28
01 01 48900 3 17 6220 489	49,577.46
01 01 48300 3 17 6220 489	-
01 01 48110 3 17 6220 489	122.87
01 01 48900 3 17 6220 489	65,316.37
01 01 25351 3 17 6250 489	(1,453,321.76)

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Schedule of Journal Entries Related to the Integrity Management Rider for the Previous Twelve Months (November 2014 thru October 2015)
General Ledger Support: Integrity Management Deferred Account Adjustment
Billing Determinants & Collections from the Integrity Management Adjustment By Month

		March - 2015				
		IM Adjustment		Usage		Collections
		(\$ per therm)	×	(therms)	-	(\$)
Line No.	_					
1	Residential (301)	0.09285		26,057,214		2,419,412.32
2	Small Commerical (302)	0.08111		10,651,066		863,907.96
3	Medium Commerical (352)	0.08111		2,717,177		220,390.23
4	Firm Lg General Sales (303)	0.03603		802,557		28,916.13
5	Firm Lg General Transportation (313)	0.03603		2,008,072		72,350.83
6	Firm Resale (310)	0.03603		-		-
7	Interruptible Lg General Sales (304)	0.00901		25,289		227.85
8	Interruptible Lg General Transportation (314)	0.00901		8,811,328		79,390.07
10	Total					\$ 3,684,595.39

Journal Entry: To Record Collections	
01 01 48010 3 17 6220 489	2,419,412.32
01 01 48110 3 17 6220 489	863,907.96
01 01 48110 3 17 6220 489	220,390.23
01 01 48120 3 17 6220 489	28,916.13
01 01 48900 3 17 6220 489	72,350.83
01 01 48300 3 17 6220 489	-
01 01 48110 3 17 6220 489	227.85
01 01 48900 3 17 6220 489	79,390.07
01 01 25351 3 17 6250 489	(3,684,595.39)

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Schedule of Journal Entries Related to the Integrity Management Rider for the Previous Twelve Months (November 2014 thru October 2015)
General Ledger Support: Integrity Management Deferred Account Adjustment
Billing Determinants & Collections from the Integrity Management Adjustment By Month

		IM Adjustment Usag		Usage		Collections
		(\$ per therm)	×	(therms)	=	(\$)
Line No.						
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)

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Schedule of Journal Entries Related to the Integrity Management Rider for the Previous Twelve Months (November 2014 thru October 2015)
General Ledger Support: Integrity Management Deferred Account Adjustment
Billing Determinants & Collections from the Integrity Management Adjustment By Month

		January - 2015							
		IM Adjustment	IM Adjustment Usage						
		(\$ per therm)	x	(therms)	=	(\$)			
Line No.									
1	Residential (301)	0.07018		25,622,995		1,798,221.79			
2	Small Commerical (302)	0.06130		10,801,835		662,152.49			
3	Medium Commerical (352)	0.06130		2,992,015		183,410.52			
4	Firm Lg General Sales (303)	0.02723		1,102,811		30,029.54			
5	Firm Lg General Transportation (313)	0.02723		2,516,617		68,527.48			
6	Firm Resale (310)	0.02723		-		-			
7	Interruptible Lg General Sales (304)	0.00681		31,615		215.30			
8	Interruptible Lg General Transportation (314)	0.00681		9,626,687		65,557.74			
10	Total					\$ 2,808,114.86			

Journal Entry: To Record Collections	
01 01 48010 3 17 6220 489	1,798,221.79
01 01 48110 3 17 6220 489	662,152.49
01 01 48110 3 17 6220 489	183,410.52
01 01 48120 3 17 6220 489	30,029.54
01 01 48900 3 17 6220 489	68,527.48
01 01 48300 3 17 6220 489	•
01 01 48110 3 17 6220 489	215.30
01 01 48900 3 17 6220 489	65,557.74
01 01 25351 3 17 6250 489	(2,808,114.86)

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Schedule of Journal Entries Related to the Integrity Management Rider for the Previous Twelve Months (November 2014 thru October 2015)
General Ledger Support: Integrity Management Deferred Account Adjustment
Billing Determinants & Collections from the Integrity Management Adjustment By Month

				December - 201	4	
		IM Adjustment		Usage		Collections
		(\$ per therm)	×	(therms)	=	(\$)
Line No.	<u>.</u>					
1	Residential (301)	0.07018		17,949,027		1,259,662.71
2	Small Commerical (302)	0.06130		7,921,400		485,581.82
3	Medium Commerical (352)	0.06130		2,278,822		139,691.79
4	Firm Lg General Sales (303)	0.02723		831,622		22,645.07
5	Firm Lg General Transportation (313)	0.02723		2,233,427		60,816.22
6	Firm Resale (310)	0.02723		-		-
7	Interruptible Lg General Sales (304)	0.00681		34,323		233.74
8	interruptible Lg General Transportation (314)	0.00681		9,320,663		63,473.72
10	Total					\$ 2,032,105.07

Journal Entry: To Record Collections	
01 01 48010 3 17 6220 489	1,259,662.71
01 01 48110 3 17 6220 489	485,581.82
01 01 48110 3 17 6220 489	139,691.79
01 01 48120 3 17 6220 489	22,645.07
01 01 48900 3 17 6220 489	60,816.22
01 01 48300 3 17 6220 489	•
01 01 48110 3 17 6220 489	233.74
01 01 48900 3 17 6220 489	63,473.72
01 01 25351 3 17 6250 489	(2,032,105.07)

2015 IMR Annual Report Schedule 2 Page 1k

Schedule of Journal Entries Related to the Integrity Management Rider for the Previous Twelve Months (November 2014 thru October 2015) General Ledger Support: Integrity Management Deferred Account Adjustment

Billing Determinants & Collections from the Integrity Management Adjustment By Month

		IM Adjustment Usage				Collections
		(\$ per therm)	x	(therms)	=	(\$)
Line No.						
1	Residential (301)	0.07018		9,078,222		637,109.62
2	Small Commerical (302)	0.06130		4,385,534		268,833.23
3	Medium Commerical (352)	0.06130		1,472,839		90,285.03
4	Firm Lg General Sales (303)	0.02723		703,976		19,169.27
5	Firm Lg General Transportation (313)	0.02723		2,071,123		56,396.68
6	Firm Resale (310)	0.02723		-		-
7	Interruptible Lg General Sales (304)	0.00681		31,687		215.79
8	Interruptible Lg General Transportation (314)	0.00681		8,620,108		58,702.94
10	Total					\$ 1,130,712.56

Journal Entry: To Record Collections	
01 01 48010 3 17 6220 489	637,109.62
01 01 48110 3 17 6220 489	268,833.23
01 01 48110 3 17 6220 489	90,285.03
01 01 48120 3 17 6220 489	19,169.27
01 01 48900 3 17 6220 489	56,396.68
01 01 48300 3 17 6220 489	•
01 01 48110 3 17 6220 489	215.79
01 01 48900 3 17 6220 489	58,702.94
01 01 25351 3 17 6250 489	(1,130,712.56)

2015 IMR Annual Report Schedule 2 Page 11

Computation of the Integrity Management Adjustment

								Large General -		
			Re	esidential	Commercial	Large Gene	erai - Firm	Interruptible		
Line No.	Rider Rate Period	Reference		(301)	(302,352)	(303,31	3,310)	(304,314)		Totai
	Jan 1 2016 -Dec 31 2016									
1	Customer Class Apportionment Percent	[Schedule 4]		59.6439%	31.2006%		4.9463%	4.2091%	,	100.0000%
2	IMRR for Recovery, excluding Refund Adjustment	[= Total from Schedule 5 x Line 1]	\$ :	12,715,165	\$ 6,651,488	\$	1,054,483 \$	897,324	\$	21,318,459
3	Deferred Account Adjustment	Actual Deferred Account Balance at Oct 31, 2015	\$	(1,424,937)	(745,405)	\$	(118,172) \$	(100,559)	\$	(2,389,073)
4	Total Amount for Recovery in this Rider	[≠ Line 2 + Line 3]	\$ :	11,290,228	5,906,083	\$	936,311 \$	796,764	\$	18,929,386
5	Throughput from Relevant Rate Case Order (Dekatherms)	(Schedule 4)	:	11,130,214	6,664,958		2,378,880	8,098,027		28,272,079
6	Rate per Dekatherm	[= Line 4 / Line 5]		\$1.01440	\$0.88610		\$0.39360	\$0.09840		
7	Proposed Integrity Management Adjustment per therm	(= Line 6 / 10 )		\$0.10144	\$0.08861		\$0.03936	\$0.00984	r	
	As previously approved:									
	Jan 1 2015 -Dec 31 2015									
8	Customer Class Apportionment Percent	[Schedule 4]		59.6439%	31.2006%		4.9463%	4.2091%		100.0000%
9	IMRR for Recovery, excluding Refund Adjustment	[= Total from Schedule 5 x Line 8]	\$ 1	11,714,840	6,128,203	\$	971,525 \$	826,730	\$	19,641,298
10	Deferred Account Adjustment	Actual Deferred Account Balance at Oct 31, 2014	\$	(1,380,560)	(722,191)	\$	(114,491) \$	(97,428)	\$	(2,314,670)
11	Total Amount for Recovery in this Rider	[= Line 9 + Line 10]	\$ :	10,334,280	5 5,406,012	\$	857,033 \$	729,302	\$	17,326,628
12	Throughput from Relevant Rate Case Order (Dekatherms)	[Schedule 4]	:	11,130,214	6,664,958		2,378,880	8,098,027		28,272,079
13	Rate per Dekatherm	[= Line 11 / Line 12]		\$0.92850	\$0.81110		\$0.36030	\$0.09010		
14	Proposed Integrity Management Adjustment per therm	(= Line 13 / 10 )		\$0.09285	\$0.08111		\$0.03603	\$0.00901		

#### Allocators from the Relevant Rate Case Order (Docket 11-00144)

Margin	Annual Total	Allocation %											
Residential (301) Commercial (302, 352) Large General Service - Firm (303, 313, 310)	\$ 62,049,925 32,459,219 5,145,869	31.20% 4.95%											
Large General Service - Interruptible (304, 314) Total	4,378,934 \$ 104,033,947	4.21%											
Throughput (DTs)	Nov	Dec	Jan	<u>Feb</u>	Maz	<u>Apr</u>	Max	<del>Jun</del>		Aug	<u>Sep</u>	<u>Qct</u>	<u>Total</u>
Residential (301) Commercial (302, 352) Large General Service - Firm (303, 313, 310) Large General Service - Interruptible (304, 314)	973,334 584,12: 215,868 682,506	941,038 357,459	2,359,121 1,236,854 373,276 899,370	2,385,891 1,246,332 272,366 728,423	1,519,952 886,901 238,238 753,173	916,259 542,351 161,907 640,120	373,476 290,561 152,836 614,296	147,666 185,427 108,789 571,617	108,017 166,853 110,733 558,058	107,902 166,553 112,060 564,523	110,242 166,151 121,273 554,369	297,754 251,717 154,075 651,023	11,130,214 6,664,958 2,378,890 8,098,027
Total	2,435,831	3,909,653	4,868,611	4,633,012	3,498,264	2,260,637	1,431,269	1,013,499	943,661	951,038	952,034	1,354,569	28,272,079
Throughput Apportionment	8.699	13.83%	17.22%	16.39%	12.37%	8.00%	5.06%	3.58%	3.34%	3.36%	3.37%	4.79%	100.00%

2015 IMR Annual Report Schedule 5

#### **Summary of IMRR Computation**

			Rate Period	Rate Period	Rate Period
			Jan 1 2014 -	Jan 1 2015 -	Jan 1 2016 -
Line No.	Vintage Year		Dec 31 2014	 Dec 31 2015	 Dec 31 2016
1	Vintage 1		13,095,492	12,594,631	12,133,623
2	Vintage 2		" n/a	7,046,667	6,777,154
3	Vintage 3		n/a	n/a	2,407,683
4	Vintage 4		n/a	 n/a	 n/a
5	Total		13,095,492	19,641,298	 21,318,459
6	Total IMRR, excluding IM Deferred Account Adjustment	\$	13,095,492	\$ 19,641,298	\$ 21,318,459
	Spread of Total IMRR, excluding IM Deferred Adjustment, by	/ Month			
7	January	\$	2,255,117	\$ 3,382,342	\$ 3,671,158.59
8	February	\$	2,145,989	\$ 3,218,665	\$ 3,493,505.82
9	March	\$	1,620,379	\$ 2,430,329	\$ 2,637,853.52
10	April	\$	1,047,116	\$ 1,570,519	\$ 1,704,625.41
11	May	\$	662,957	\$ 994,337	\$ 1,079,242.99
12	June	\$	469,448	\$ 704,102	\$ 764,225.07
13	ylut	\$	437,099	\$ 655,584	\$ 711,564.21
14	August	\$	440,516	\$ 660,709	\$ 717,126.91
15	September	\$	440,978	\$ 661,401	\$ 717,877.99
16	October	\$	627,430	\$ 941,052	\$ 1,021,408.23
17	November	\$	1,137,529	\$ 1,706,125	\$ 1,851,810.38
18	December	\$	1,810,933	\$ 2,716,131	\$ 2,948,059.87
19	Total	\$	13,095,492	\$ 19,641,298	\$ 21,318,459.00

Annual Revenue Requirement Computation Rider Rate Period: January 1, 2016 - December 31, 2016

#### Vintage Year 1 - Fiscal Year October 31, 2013

	<u>Year 1</u>	<u>Year 2</u>	Year 3	Year 4	Year 5
Plant	100,306,283	100,306,283	100,306,283	100,306,283	100,306,283
Accumulated depreciation	(974,476)	(2,428,917)	(3,883,358)	(5,337,799)	(6,792,240)
Net plant	99,331,807	97,877,366	96,422,925	94,968,484	93,514,043
ADIT	(4,057,566)	(6,977,762)	(9,549,872)	(11,808,303)	(13,792,262)
Net investment	95,274,242	90,899,604	86,873,053	83,160,182	79,721,781
Pre-tax ROR%	11.446%	11.446%	11.446%	11.446%	11.446%
Pre-tax rate of return	10,904,782	10,404,075	9,943,209	9,518,245	9,124,697
Depreciation expense	1,454,441	1,454,441	1,454,441	1,454,441	1,454,441
Property Tax expense	732,236	732,236	732,236	732,236	732,236
Total, excluding uncollectibles	13,091,459	12,590,752	12,129,886	11,704,922	11,311,374
Uncollectibles gross-up factor	1.000308	1.000308	1.000308	1.000308	1.000308
Total revenue requirement	13,095,492	12,594,631	12,133,623	11,708,529	11,314,859

#### Assumptions and calculations:

Rider computed each year.

Normal depreciation and AFUDC practices apply, AFUDC ends and depreciation begins when plant goes into service.

Net of tax rate of return 6.96% 6.96% 6.96% 6.96% 6.96% 6.96%

Annual Revenue Requirement Computation
Rider Rate Period: January 1, 2016 - December 31, 2016

#### Vintage Year 1 - Fiscal Year October 31, 2013

					2015 IMR A	Annual Report
Plant amount	100,306,283					Schedule 6
Book depreciation rate	1.45%					Page 1b
Property Tax Rate	0.73%					
Tax depreciation	MACRS 15	assumed no bonus de	preciation			
Plant in service date for this Vintage	31-Oct-13					
Original Rider effective date for this Vintage	1-Jan-14					
Fiscal year end for this Vintage	31-Oct-13					
SIT rate		6.50%	6.50%	6.50%	6.50%	<b>6.50%</b>
FIT rate		35.00%	35.00%	35.00%	35.00%	35.00%
Composite income tax rate		39.23%	39.23%	39.23%	39.23%	39.23%
Uncollectibles rate		0.0308%	0.0308%	0.0308%	0.0308%	0.0308%
Revenue requirement gross-up factor		1.000308	1.000308	1.000308	1.000308	1.000308
Capital structure assumptions (rate case):						
LTD	41.42%					
STD	5.87%					
Common equity	52.71%					
Capital cost rate assumptions (rate case):						
LTD	6.05%					
STD	1.59%	•				
Common equity	10.20%					
Overall and pre-tax RORs						
	<u>Overall</u>			Pre	-tax RORs	
LTD	2.506%	2.506%	2.506%	2.506%	2.506%	2.506%
STD	0.093%	0.093%	0.093%	0.093%	0.093%	0.093%
Common equity	5.376%	8.846%	8.846%	8.846%	8.846%	8.846%
Total	7.976%	11.446%	11.446%	11.446%	11.446%	11.445%

Annual Revenue Requirement Computation Rider Rate Period: January 1, 2016 - December 31, 2016

#### Vintage Year 1 - Fiscal Year October 31, 2013

MACRS 15 tax depreciation schedule					2015 IMR	Annual Report Schedule 6
MACKS 13 tax debiectation schedule	Rate	Yearly	Cumulative			Page 1c
Tax year 1	5.00%	5,015,314				
Tax year 2	9.50%	9,529,097	14,544,411			
Tax year 3	8.55%	8,576,187	23,120,598			
Tax year 4	7.70%	7,723,584	30,844,182			
Tax year 5	6.93%	6,951,225	37,795,407			
Tax year 6	6.23%	6,249,081	44,044,489			
Tax year 7	5.90%	5,918,071	49,962,560			
Tax year 8	5.90%	5,918,071	55,880,630			
Tax year 9	5.91%	5,928,101	61,808,732			
Tax year 10	5.90%	5,918,071	67,726,802			
Tax year 11	5.91%	5,928,101	73,654,904			
Tax year 12	5.90%	5,918,071	79,572,974			
Tax year 13	5.91%	5,928,101	85,501,076		•	
Tax year 14	5.90%	5,918,071	91,419,146			
Tax year 15	5.91%	5,928,101	97,347,248			
Tax year 16	2.95%	2,959,035	100,306,283			
Total	100.00%	100,306,283				
Accumulated depreciation						
Portion of year in sevice before rider	17%					
Pre-rider amount of depreciation	247,255					
Rider year BOY amount		247,255	1,701,696	3,156,137	4,610,578	6,065,019
Depreciation expense		1,454,441	1,454,441	1,454,441	1,454,441	1,454,441
Rider year EOY amount	*****	1,701,696	3,156,137	4,610,578	6,065,019	7,519,461
Average accumulated depreciation		974,476	2,428,917	3,883,358	5,337,799	6,792,240

Annual Revenue Requirement Computation
Rider Rate Period: January 1, 2016 - December 31, 2016

#### Vintage Year 1 - Fiscal Year October 31, 2013

					2015 IMR	Annual Report
Tax depreciation reserve						Schedule 6
FY of completion tax depreciation	5,015,314					Page 1d
Post FY tax depreciation to rider date	17%					
Tax year 2 tax depreciation	9,529,097					
Tax year 2 pre-rider tax depr	1,619,946					
Rider year BOY amount		6,635,261	16,002,363	24,433,607	32,025,890	38,857,751
Tax period A tax depreciaion		7,909,150	7,118,235	6,410,575	5,769,517	5,186,738
Tax period B tax depreciation		1,457,952	1,313,009	1,181,708	1,062,344	1,006,072
Rider year EOY amount		16,002,363	24,433,607	32,025,890	38,857,751	45,050,561
Average tax depreciation reserve	_	11,318,812	20,217,985	<b>28,229,74</b> 9	35,441,821	41,954,156
Note - gap between fiscal year and rider year a	ddressed by tax perio	od A and tax period	I B.			
Accumulated deferred taxes						
Average tax depreciation reserve		11,318,812	20,217,985	28,229,749	35,441,821	41,954,156
Average book depreciation reserve		974,476	2,428,917	3,883,358	5,337,7 <del>9</del> 9	6,792,240
Difference	_	10,344,336	17,789,069	24,346,391	30,104,022	35,161,916
Composite tax rate		39.23%	39.23%	39.23%	39.23%	39.23%
Average ADIT		4,057,566	6,977,762	9,549,872	11,808,303	13,792,262

Note - composite tax rate ignores excess deferred tax flowback

Annual Revenue Requirement Computation Rider Rate Period: January 1, 2016 - December 31, 2016

#### Vintage Year 2 - Fiscal Year October 31, 2014

	Year 1	Year 2	Year 3	Year 4	Year 5
Plant	53,974,676	53,974,676	53,974,676	53,974,676	53,974,676
Accumulated depreciation	(524,364)	(1,306,997)	(2,089,630)	(2,872,262)	(3,654,895)
Net plant	53,450,312	52 <b>,667,</b> 679	51,885,047	51,102,414	50,319,781
ADIT	(2,183,371)	(3,754,724)	(5,138,773)	(6,354,032)	(7,421,597)
Net investment	51,266,941	48,912,955	46,746,273	44,748,382	42,898,184
Pre-tax ROR%	11.446%	11.446%	11.446%	11.446%	11.446%
Pre-tax rate of return	5,867,848	5,598,419	5,350,427	5,121,755	4,909,987
Depreciation expense	<b>782,</b> 633	782,633	782,633	782,633	782,633
Property Tax expense	394,015	394,015	394,015	394,015	394,015
Total, excluding uncollectibles	7,044,496	6 <b>,775,06</b> 7	6,527,075	6,298,403	6,086,635
Uncollectibles gross-up factor	1.000308	1.000308	1.000308	1.000308	1.000308
Total revenue requirement	7,046,667	6,777,154	6,529,086	6,300,344	6,088,511

#### Assumptions and calculations:

Rider computed each year.

Normal depreciation and AFUDC practices apply, AFUDC ends and depreciation begins when plant goes into service.

Net of tax rate of return 6.96% 6.96% 6.96% 6.96% 6.96% 6.96%

Annual Revenue Requirement Computation Rider Rate Period: January 1, 2016 - December 31, 2016

#### Vintage Year 2 - Fiscal Year October 31, 2014

					2015 IMR A	Annual Report
Plant amount	53,974,676					Schedule 7
Book depreciation rate	1.45%					Page 1b
Property Tax Rate	0.73%					
Tax depreciation	MACRS 15	assumed no bonus de	preciation			
Plant in service date for this Vintage	31-Oct-14					
Original Rider effective date for this Vintage	1-Jan-15					
Fiscal year end for this Vintage	31-Oct-14					
SIT rate		6.50%	6.50%	6.50%	6.50%	6.50%
FIT rate		35.00%	35.00%	35.00%	35.00%	35.00%
Composite income tax rate		39.23%	39.23%	39.23%	39.23%	39.23%
Uncollectibles rate		0.0308%	0.0308%	0.0308%	0.0308%	0.0308%
Revenue requirement gross-up factor		1.000308	1.000308	1.000308	1.000308	1.000308
Capital structure assumptions (rate case):						
LTD	41.42%					
STD	5.87%					
Common equity	52.71%					
Capital cost rate assumptions (rate case):						
LTD	6.05%					
STD	1.59%					
Common equity	10.20%					
Overall and pre-tax RORs						
· · · · · · · · · · · · · · · · · · ·	<u>Overall</u>			Pre	-tax RORs	
LTD	2.506%	2.506%	2.506%	2.506%	2.506%	2.506%
STD	0.093%	0.093%	0.093%	0.093%	0.093%	0.093%
Common equity	5.376%	8.846%	8.846%	8.846%	8.846%	8.846%
Total	7.976%	11.446%	11.446%	11.446%	11.446%	11.446%

Annual Revenue Requirement Computation
Rider Rate Period: January 1, 2016 - December 31, 2016

#### Vintage Year 2 - Fiscal Year October 31, 2014

MACRS 15 tax depreciation schedule					2015 IMR	Annual Report Schedule 7
WACKS 13 GA GEDI ECIAGON SCHEGUIE	Rate	Yearly	Cumulative			Page 1c
Tax year 1	5.00%	2,698,734				
Tax year 2	9.50%	5,127,594	7,826,328			
Tax year 3	8.55%	4,614,835	12,441,163			
Tax year 4	7.70%	4,156,050	16,597,213			
Tax year 5	6.93%	3,740,445	20,337,658			
Tax year 6	6.23%	3,362,622	23,700,280			
Tax year 7	5.90%	3,184,506	26,884,786			
Tax year 8	5.90%	3,184,506	30,069,292			
Tax year 9	5.91%	3,189,903	33,259,195			
Tax year 10	5.90%	3,184,506	36,443,701			
Tax year 11	5.91%	3,189,903	39,633,605			
Tax year 12	5.90%	3,184,506	42,818,111			
Tax year 13	5.91%	3,189,903	46,008,014			
Tax year 14	5.90%	3,184,506	49,192,520			
Tax year 15	5.91%	3,189,903	52,382,423			
Tax year 16	2.95%	1,592,253	53,974,676			
Total	100.00%	53,974,676				
Accumulated depreciation						
Portion of year in sevice before rider	17%					
Pre-rider amount of depreciation	133,048					
Rider year BOY amount		133,048	915,680	1,698,313	2,480,946	3,263,579
Depreciation expense		782,633	782,633	782,633	782,633	782,633
Rider year EOY amount	.******	915,680	1,698,313	2,480,946	3,263,579	4,046,212
Average accumulated depreciation		524,364	1,306,997	2,089,630	2,872,262	3,654,895

Annual Revenue Requirement Computation
Rider Rate Period: January 1, 2016 - December 31, 2016

#### Vintage Year 2 - Fiscal Year October 31, 2014

Tax depreciation reserve  FY of completion tax depreciation  Post FY tax depreciation to rider date  17%  Scheding Sched	dule 7 ge 1d
,	ge 1d
Post FY tax depreciation to rider date 17%	
Tax year 2 tax depreciation 5,127,594	
Tax year 2 pre-rider tax depr 871,691	
Rider year BOY amount 3,570,425 8,610,850 13,147,691 17,233,089 20,909,	,304
Tax period A tax depreciaion 4,255,903 3,830,313 3,449,522 3,104,569 2,790,	,977
Tax period B tax depreciation 784,522 706,529 635,876 571,646 541,	,366
Rider year EOY amount 8,610,850 13,147,691 17,233,089 20,909,304 24,241,	.,646
Average tax depreciation reserve 6,090,637 10,879,271 15,190,390 19,071,196 22,575,	,475
Note - gap between fiscal year and rider year addressed by tax period A and tax period B.	
Accumulated deferred taxes	
Average tax depreciation reserve 6,090,637 10,879,271 15,190,390 19,071,196 22,575,	,475
Average book depreciation reserve 524,364 1,306,997 2,089,630 2,872,262 3,654,	,895
Difference 5,566,273 9,572,274 13,100,760 16,198,934 18,920,	,580
Composite tax rate 39.23% 39.23% 39.23% 39.23% 39.23% 39.23%	3.23%
Average ADIT 2,183,371 3,754,724 5,138,773 6,354,032 7,421,	,597

Note - composite tax rate ignores excess deferred tax flowback

Annual Revenue Requirement Computation Rider Rate Period: January 1, 2016 - December 31, 2016

#### Vintage Year 3 - Fiscal Year October 31, 2015

	Year 1	Year 2	Year 3	Year 4	Year 5
Plant	18,441,896	18,441,896	18,441,896	18,441,896	18,441,896
Accumulated depreciation	(179,163)	(446,571)	(713,978)	(981,386)	(1,248,793)
Net plant	18,262,733	17,995,326	17,727,918	17,460,511	17,193,103
ADIT	(746,007)	(1,282,902)	(1,755,800)	(2,171,025)	(2,535,788)
Net investment	17,516,726	16,712,423	15,972,118	15,289,485	14,657,315
Pre-tax ROR%	11.446%	11.446%	11.446%	11.446%	11.446%
Pre-tax rate of return	2,004,908	1,912,850	1,828,117	1,749,985	1,677,629
Depreciation expense	267,407	267,407	267,407	267,407	267,407
Property Tax expense	134,626	134,626	134,626	134,626	134,626
Total, excluding uncollectibles	2,406,941	2,314,883	2,230,150	2,152,018	2,079,662
Uncollectibles gross-up factor	1.000308	1.000308	1.000308	1.000308	1.000308
Total revenue requirement	2,407,683	2,315,596	2,230,837	2,152,681	2,080,303

#### Assumptions and calculations:

Rider computed each year.

Normal depreciation and AFUDC practices apply, AFUDC ends and depreciation begins when plant goes into service.

Net of tax rate of return 6.96% 6.96% 6.96% 6.96% 6.96% 6.96%

Annual Revenue Requirement Computation
Rider Rate Period: January 1, 2016 - December 31, 2016

#### Vintage Year 3 - Fiscal Year October 31, 2015

Plant amount Book depreciation rate	18,441,896 1.45% 0.73%				2015 IMR /	Annual Report Schedule 8 Page 1b
Property Tax Rate	•					
Tax depreciation	MACRS 15	assumed no bonus de	epreciation			
Plant in service date for this Vintage	31-Oct-15					
Original Rider effective date for this Vintage	1-Jan-16					
Fiscal year end for this Vintage	31-Oct-15					
SIT rate		6.50%	6.50%	6.50%	6.50%	6.50%
FIT rate		35.00%	35.00%	35.00%	35.00%	35.00%
Composite income tax rate		39.23%	39.23%	39.23%	39.23%	39.23%
Uncollectibles rate		0.0308%	0.0308%	0.0308%	0.0308%	0.0308%
Revenue requirement gross-up factor		1.000308	1.000308	1.000308	1.000308	1.000308
Capital structure assumptions (rate case):						
LTD	41.42%					
STD	5.87%					
Common equity	52.71%					
Capital cost rate assumptions (rate case):						
LTD	6.05%					
STD	1.59%					
Common equity	10.20%					
Overall and pre-tax RORs						
	<u>Overall</u>			Pre	-tax RORs	
LTD	2.506%	2.506%	2.506%	2.506%	2.506%	2.506%
STD	0.093%	0.093%	0.093%	0.093%	0.093%	0.093%
Common equity	5.376%	8.846%	8.846%	8.846%	8.846%	8.846%
Total	7.976%	11.446%	11.446%	11.446%	11.446%	11.446%

Annual Revenue Requirement Computation
Rider Rate Period: January 1, 2016 - December 31, 2016

#### Vintage Year 3 - Fiscal Year October 31, 2015

MACRS 15 tax depreciation schedule					2015 IMR	Annual Report Schedule 8
MACIS 15 tax depletionistication	Rate	Yearly	Cumulative			Page 1c
Tax year 1	5.00%	922,095				_
Tax year 2	9.50%	1,751,980	2,674,075			
Tax year 3	8.55%	1,576,782	4,250,857			
Tax year 4	7.70%	1,420,026	5,670,883			
Tax year 5	6.93%	1,278,023	6,948,906			
Tax year 6	6.23%	1,148,930	8,097,837			
Tax year 7	5.90%	1,088,072	9,185,908			•
Tax year 8	5.90%	1,088,072	10,273,980			
Tax year 9	5.91%	1,089,916	11,363,896			
Tax year 10	5.90%	1,088,072	12,451,968			
Tax year 11	5.91%	1,089,916	13,541,884			
Tax year 12	5.90%	1,088,072	14,629,956			
Tax year 13	5.91%	1,089,916	15,719,872			
Tax year 14	5.90%	1,088,072	16,807,944			
Tax year 15	5.91%	1,089,916	17,897,860			
Tax year 16	2.95%	544,036	18,441,896			
Total	100.00%	18,441,896				
Accumulated depreciation						
Portion of year in sevice before rider	17%					
Pre-rider amount of depreciation	45,459					
Rider year BOY amount		45,459	312,867	580,274	847,682	1,115,089
Depreciation expense		267,407	267,407	267,407	267,407	267,407
Rider year EOY amount	_	312,867	580,274	847,682	1,115,089	1,382,497
Average accumulated depreciation		179,163	446,571	713,978	981,386	1,248,793

Annual Revenue Requirement Computation
Rider Rate Period: January 1, 2016 - December 31, 2016

#### Vintage Year 3 - Fiscal Year October 31, 2015

			•		2015 IMR	Annual Report
Tax depreciation reserve						Schedule 8
FY of completion tax depreciation	922,095					Page 1d
Post FY tax depreciation to rider date	17%					
Tax year 2 tax depreciation	1,751,980					
Tax year 2 pre-rider tax depr	297,837					
Rider year BOY amount		1,219,931	2,942,128	4,492,261	5,888,147	7,144,225
Tax period A tax depreciaion		1,454,144	1,308,729	1,178,622	1,060,759	953,612
Tax period B tax depreciation		268,053	241,404	217,264	195,318	184,972
Rider year EOY amount	*****	2,942,128	4,492,261	5,888,147	7,144,225	8,282,809
Average tax depreciation reserve		2,081,030	3,717,1 <b>9</b> 5	5,190,204	6,516,186	7,713,517
Note - gap between fiscal year and rider year ad	dressed by tax period A	and tax period B.				
Accumulated deferred taxes						
Average tax depreciation reserve		2,081,030	3,717,195	5,190,204	6,516,186	7,713,517
Average book depreciation reserve		179,163	446,571	713,978	981,386	1,248,793
Difference	******	1,901,867	3,270,624	4,476,226	5,534,800	6,464,724
Composite tax rate		39.23%	39.23%	39.23%	39.23%	39.23%
Average ADIT		746,007	1,282,902	1,755,800	2,171,025	2,535,788

Note - composite tax rate ignores excess deferred tax flowback

**Schedule of Prior Period Adjustments** 

None

2015 IMR Annual Report Schedule 9

2015 IMR Annual Report Schedule 10

#### **Statement of Public Interest**

Piedmont is not aware of any changes in the market conditions or other factors that affect whether this Rider is still in the public interest.

### PIEDMONT NATURAL GAS COMPANY, INC. GUIDELINES FOR SYSTEM INTEGRITY PROJECTS

Purpose is to ensure a safe and reliable steel infrastructure that meets regulations set by the US Department of Transportation.

#### OPERATIONS & MAINTENANCE (O&M) EXPENSE:

O&M is basically defined as any work done on an asset that deals with a component that is less than a retirement unit. All routine maintenance should be expensed as incurred. Piedmont further defines O&M System Integrity as follows:

- Cathodic Protection (CP) technicians monitor and maintain the CP system
  - o CP readings at testing stations and casings
  - o Troubleshoot interference issues
  - o AC Mitigation results
- Rectifier monitoring and troubleshooting
- Transmission Integrity Management Program (TIMP) support
  - o Annual High Consequence Areas (HCA) field verification
  - o Engineering overall
  - o Bell hole examinations in support of the following work:
    - External Corrosion Direct Assessment (ECDA)
    - Internal Corrosion Direct Assessment (ICDA)
    - Confirmatory Direct Assessment (CDA)
    - Inline Inspection (ILI)
      - Pig runs including equipment and labor
      - Labor & equipment for chemical cleaning, foam pigs
      - Survey Above Ground Marker (AGM) locations
      - Inspection support
      - Contractor support during tool run only
      - Engineering support interpreting data
      - · Engineering, survey, digs, assessment
      - Mowing for Close Interval Pipe-To-Soil Survey (CIS)
      - · CIS for those transmission lines being pigged
      - Pipe-to-soil
      - Soil resistivity
      - Depth of cover
      - Ultrasonic thickness (UT)
      - External pit depth measurements
      - TCAT
      - Soil pH
      - Coating inspections
      - Defect analysis and remediation determining defect classification and repair method

#### CAPITAL EXPENDITURE:

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Capital Expenditures are major expenditures on assets that last longer than a year and improve or lengthen the expected useful life of the overall property from original expectations that are recoverable in utility rate base. As a general Company rule, projects costing less than \$1,500 are not capitalized (see section 3.0 of the Company's Corporate Accounting Manual). New additions consist of retirement unit installations that did not currently exist in the system. Replacements are the installation of retirement units where one existed before the new one was installed (see 40 ft rule for the Replacement of Mains under section 3.5 of the Company's Corporate Accounting Manual). In conjunction with a replacement, a retirement is required of the original retirement unit no longer useful. Piedmont further defines Capital Expenditures for System Integrity projects into the following subgroups:

- Remediation of CIS findings
- Regulator station upgrade projects Distribution Integrity Management Program (DIMP)
- Linear anode installations
- AC mitigation projects
- Conventional ground bed installation
- TIMP remediation
  - Labor, equipment & material for cutouts of >= 40ft
  - o Survey
  - o X-ray

#### **DEFINITIONS:**

Retirement Unit - A Retirement Unit is the smallest distinct component of property that is identified and costed individually in the plant records.

Property Unit - A Property Unit is an item or group of items that constitutes the minimum division of plant that is continuously associated with its cost in the plant records. It may include one or more retirement units and associated minor items. It is capitalized when placed in service and retired when no longer "used and useful".

#### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on November 30, 2015, a copy of the attached documents were served upon the following 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

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