

BASS BERRY + SIMS_{nc}

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filed electronically in docket office on 02/11/16

February 11, 2016

Via Email
and Hand-Delivery

David Foster
Chief, Utility 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

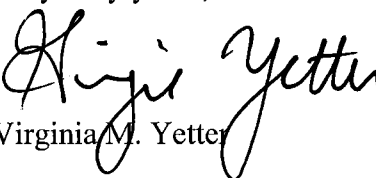
Dear Mr. Foster:

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 December 31, 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 December 31, 2015.

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

Very truly yours,


Virginia M. Yetter

Enclosures

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

Line No.		Current Vintage Year: Vintage Year 4			All Vintage Years
		December 2015 Capital Expenditure ¹	Prior Cumulative Capital Expenditure ²	Cumulative Capital Expenditure as of December 2015 ³	Cumulative Capital Expenditure as of December 2015 ⁶
	<i>TN Direct</i>				
1	Corrosion Control	\$ -	\$ -	\$ -	\$ 5,159,550.29
2	Casing Remediation	\$ 11,759.75	\$ 10,482.23	\$ 22,241.98	\$ 729,069.22
3	Distribution Integrity	\$ 1,803,576.11	\$ 1,059,126.18	\$ 2,862,702.29	\$ 21,873,676.58
4	Transmission Integrity	\$ 157,604.79	\$ 310,878.25	\$ 468,483.04	\$ 165,028,920.92
5	Total	\$ 1,972,940.65	\$ 1,380,486.66	\$ 3,353,427.31	\$ 192,791,217.01
	<i>Joint Property: CO3-State</i>				
6	OASIS Project (Work & Asset Management System)	\$ 1,291,237.27	\$ 1,208,124.89	\$ 2,499,362.16	\$ 92,540,410.04
7	TN % of CO-3 for Current Month ⁴	17.16%			
8	Total Allocated to TN	\$ 221,576.32	\$ 207,314.23	\$ 428,890.55	\$ 16,613,955.65
9	Total Capital Expenditures [Line 5 + Line 8]	\$ 2,194,516.97	\$ 1,587,800.89	\$ 3,782,317.86	\$ 209,405,172.66
10	Less: Amount Included in the Attrition Period ⁵	\$ -	\$ -	\$ -	\$ 32,900,000.00
11	Total Integrity Management Investment	\$ 2,194,516.97	\$ 1,587,800.89	\$ 3,782,317.86	\$ 176,505,172.66

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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, 2 and 3, which captures amounts through 10/31/15, is \$172,722,854.80 (\$100,306,282.52 for Vintage Year 1, \$53,974,676.15 for Vintage Year 2 & \$18,441,896.09 for Vintage Year 3).

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

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	December 2015
1	CSNG-Casing & Remediation	FP1733739	17	Casing removal 2719,2738,2790,	\$ 11,111.35
2	CSNG-Casing & Remediation	FP1733743	17	O.H.B Casing#2766	\$ 648.40
3	DIMP-Distribution Integrity	FP1733760	17	Main St @ No 1st St	\$ 17,835.17
4	DIMP-Distribution Integrity	FP1733761	17	Kline Ave.	\$ 155,118.84
5	DIMP-Distribution Integrity	FP1733765	17	McGavock Pike	\$ 2,403.15
6	DIMP-Distribution Integrity	FP1733885	17	2nd Ave North 14" Replacement	\$ 13,316.53
7	DIMP-Distribution Integrity	FP1733931	17	Shelby Park RR Bridge Project	\$ 28,532.80
8	DIMP-Distribution Integrity	FP1733938	17	23rd Ave N @ Osage St	\$ 26,218.30
9	DIMP-Distribution Integrity	FP1733945	17	Old Hickory Blvd. @ Logistics Way R	\$ 50,086.70
10	DIMP-Distribution Integrity	FP1733946	17	State Rte 45 Over Cumberland River	\$ 1,500,354.17
11	DIMP-Distribution Integrity	FP1733947	17	Nolensville Rd. Over RR S of I-440	\$ 9,019.96
12	DIMP-Distribution Integrity	FP1734136	17	Jones St Renewal	\$ 690.49
13	TIMP-Transmission Integrity	FP1733365	17	Nashville IJI Retrofit Project	\$ 220.98
14	TIMP-Transmission Integrity	FP1733398	17	South Nashville 20"	\$ 95,554.79
15	TIMP-Transmission Integrity	FP1733747	17	White Bridge Road at Charlotte	\$ 825.04
16	TIMP-Transmission Integrity	FP1733929	17	White Bridge Road @ Post Rd. r	\$ 41,520.06
17	TIMP-Transmission Integrity	FP1733950	17	County Hospital Rd Station LNG	\$ 19,483.92
18	ISENP-Information Serv Enterprise	FP0026658	17	Work & Asset Management (OASIS)	\$ 1,291,237.27

Total (unallocated)

\$ 3,264,177.92

19 subtotal: TN Direct (unallocated)

\$ 1,972,940.65

20 subtotal: CO-3 (unallocated)

\$ 1,291,237.27

\$ 3,264,177.92

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>Dec-15</u>
1	Beginning Balance	<i>Prior Month's IMR Report</i>	\$ (1,609,594.47)
2	IMR Revenue Recognition	<i>Prior Annual IMR Report</i>	2,716,130.71
3	(Collections from IM Adjustment)	<i>see Separate Schedule</i>	(1,734,876.43)
4	Ending Balance Before Interest	<i>sum Lines 1 thru 3</i>	(628,340.19)
5	Average Balance	<i>(Line 1 + Line 4) / 2</i>	(1,118,967.33)
6	Accrued Interest	<i>Line 5 * Line 9</i>	(3,030.16)
7	Ending Balance After Interest	<i>Line 4 + Line 6</i>	\$ (631,370.35)
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>	\$ (631,370.35)
11	Variance	<i>Line 7 - Line 10</i>	\$ 0.00

Journal Entry: To Record Revenue

01 01 25351 3 17 6250 489	2,716,130.71
01 01 48010 3 17 6220 489	(1,620,009.00)
01 01 48110 3 17 6220 489	(847,785.88)
01 01 48120 3 17 6220 489	(36,287.51)
01 01 48300 3 17 6220 489	(760.52)
01 01 48900 3 17 6220 489	(211,287.80)

Journal Entry: To Record Interest

01 01 25351 3 17 6250 626	(3,030.16)
01 01 43101 3 17 6220 626	3,030.16

General Ledger Support

Integrity Management Deferred Account Adjustment Recorded for the Month

Calculation of the IM Adjustment Collections:

		Dec - 2015		
Line No.		IM Adjustment (\$ per therm)	x Usage (therms)	= Collections (\$)
1	Residential (301)	0.09285	11,165,919	1,036,755.58
2	Small Commerical (302)	0.08111	5,026,025	407,660.89
3	Medium Commerical (352)	0.08111	1,468,378	119,100.14
4	Firm Lg General Sales (303)	0.03603	741,539	26,717.65
5	Firm Lg General Transportation (313)	0.03603	1,830,518	65,953.56
6	Firm Resale (310)	0.03603	-	-
7	Interruptible Lg General Sales (304)	0.00901	19,722	177.70
8	Interruptible Lg General Transportation (314)	0.00901	8,713,752	78,510.91
9	Total			\$ 1,734,876.43

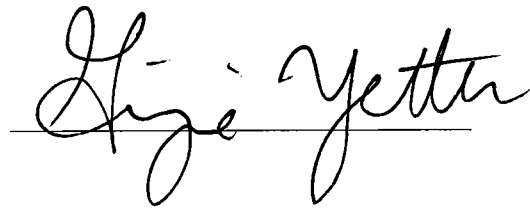
Journal Entry: To Record Collections

01 01 48010 3 17 6220 489	1,036,755.58
01 01 48110 3 17 6220 489	407,660.89
01 01 48110 3 17 6220 489	119,100.14
01 01 48120 3 17 6220 489	26,717.65
01 01 48900 3 17 6220 489	65,953.56
01 01 48300 3 17 6220 489	-
01 01 48110 3 17 6220 489	177.70
01 01 48900 3 17 6220 489	78,510.91
01 01 25351 3 17 6250 489	(1,734,876.43)

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on February 11, 2016, a copy of the attached was 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

A handwritten signature in cursive script, reading "Lizi Yetter", is written over a horizontal line.