BASS BERRY + SIMS...

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TN REGULATORY AUTHORITY
UTILITIES DIVISION

January 13, 2016

<u>Via Email</u> 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:

Virginia M. Yetter

PHONE:

FAX:

F-MAIL:

(615) 742-7858

(615) 742-6293

VYetter@bassberry.com

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 November 30, 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 November 30, 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

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

<u>Cumulative Integrity Management Investment Amount</u> Actual Integrity Management Investment, by Integrity Project Type

		Current Vintage Year: Vintage Year 4					Δ	ll Vintage Years
Line No.	- TN Direct	November 2015 <u>Capital Expenditure</u> ¹		Prior Cumulative <u>Capital Expenditure</u> ²		Cumulative pital Expenditure of November 2015 ³		Cumulative pital Expenditure f November 2015 ⁶
1	Corrosion Control	\$	\$		\$		\$	5,159,550.29
2	Casing Remediation	\$ 10,482.23	\$	-	\$	10,482.23	\$	717,309.47
3	Distribution Integrity	\$ 1,059,126.18	\$	-	\$	1,059,126.18	\$	20,070,100.47
4	Transmission Integrity	\$ 310,878.25	\$	-	\$	310,878.25	\$	164,871,316.13
5	Total	\$ 1,380,486.66	\$	-	\$	1,380,486.66	\$	190,818,276.36
	Joint Property: CO3-State							
6	OASIS Project (Work & Asset Management System)	\$ 1,208,124.89	\$	-	\$	1,208,124.89	\$	91,249,172.77
7	TN % of CO-3 for Current Month 4	17.16%						
8	Total Allocated to TN	\$ 207,314.23	\$	-	\$	207,314.23	\$	16,392,379.33
9	Total Capital Expenditures [Line 5 + Line 8]	\$ 1,587,800.89	\$	-	\$	1,587,800.89	\$	207,210,655.69
10	Less: Amount Included in the Attrition Period ⁵	\$ <u> </u>			\$	-	\$	32,900,000.00
11	Total Integrity Management Investment	\$ 1,587,800.89	\$		\$	1,587,800.89	\$	174,310,655.69

^{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, \$53,974,676.19 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

		Funding Project			
Line No.	Capital Project Type	Number	District	Funding Project Description	November 2015
1	CSNG-Casing & Remediation	FP1733739	17	Casing removal 2719,2738,2790,	8,799.90
2	CSNG-Casing & Remediation	FP1733743	17	O.H.B Casing#2766	1,682.33
3	DIMP-Distribution Integrity	FP1733753	17	3rd and Hart renewal-upgrade	1,291.00
4	DIMP-Distribution Integrity	FP1733759	17	Sunriser Ave & McCombs Ave	14,523.89
5	DIMP-Distribution Integrity	FP1733760	17	Main St @ No 1st St	29,599.13
6	DIMP-Distribution Integrity	FP1733761	17	Kline Ave.	74,941.34
7	DIMP-Distribution Integrity	FP1733762	17	Grandview Ave	16,205.63
8	DIMP-Distribution Integrity	FP1733765	17	McGavock Pike	864.26
9	DIMP-Distribution Integrity	FP1733885	17	2nd Ave North 14" Replacement	(12,372.07)
10	DIMP-Distribution Integrity	FP1733931	17	Shelby Park RR Bridge Project	22,707.38
11	DIMP-Distribution Integrity	FP1733938	17	23rd Ave N @ Osage St	90.11
12	DIMP-Distribution Integrity	FP1733945	17	Old Hickory Blvd. @ Logistics Way R	612,250.65
13	DIMP-Distribution Integrity	FP1733946	17	State Rte 45 Over Cumberland River	287,994.07
14	DIMP-Distribution Integrity	FP1733947	17	Nolensville Rd. Over RR S of I-440	9,564.13
15	DIMP-Distribution Integrity	FP1734027	17	Donelson St @ Robertson St	1,466.66
16	TIMP-Transmission Integrity	FP1733365	17	Nashville ILI Retrofit Project	(205.29)
17	TIMP-Transmission Integrity	FP1733398	17	South Nashville 20"	(32,443.58)
18	TIMP-Transmission Integrity	FP1733461	17	Nashville ILI Retrofit Holtsho	58.90
19	TIMP-Transmission Integrity	FP1733747	17	White Bridge Road at Charlotte	2,391.60
20	TIMP-Transmission Integrity	FP1733929	17	White Bridge Road @ Post Rd. r	156,672.48
21	TIMP-Transmission Integrity	FP1733950	17	County Hospital Rd Station LNG	184,404.14
22	ISENP-Information Serv Enterprise	FP0026658	17	Work & Asset Management (OASIS)	\$ 1,208,124.89

	Total (unallocated)	\$	2,588,611.55
23	subtotal: TN Direct (unallocated)	\$	1,380,486.66
24	subtotal: CO-3 (unallocated)	\$_	1,208,124.89
		\$	2,588,611.55

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.			Nov-15
1	Beginning Balance	Prior Month's IMR Report	\$ (2,389,073.16)
2	IMR Revenue Recognition	Prior Annual IMR Report	1,706,125.14
3	(Collections from IM Adjustment)	see Separate Schedule	(921,239.57)
4	Ending Balance Before Interest	sum Lines 1 thru 3	(1,604,187.59)
5	Average Balance	(Line 1 + Line 4) /2	(1,996,630.38)
6	Accrued Interest	Line 5 * Line 9	(5,406.88)
7	Ending Balance After Interest	Line 4 + Line 6	\$ (1,609,594.47)
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	\$ (1,609,594.47)
11	Variance	Line 7 - Line 10	\$ -
Journal En	try: To Record Revenue		
	01 01 25351 3 17 6250 489		1,706,125.14
	01 01 48010 3 17 6220 489		(1,017,601.28)
	01 01 48110 3 17 6220 489		(532,532.84)
	01 01 48120 3 17 6220 489		(22,793.83)
	01 01 48300 3 17 6220 489		(477.72)
	01 01 48900 3 17 6220 489		(132,719.47)
Journal Fn	try: To Record Interest		(0.00)
Journa, Ell	01 01 25351 3 17 6250 626		(5,406.88)
	01 01 43101 3 17 6220 626		5,406.88

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

General Ledger Support

Integrity Management Deferred Account Adjustment Recorded for the Month

Calculation of the IM Adjustment Collections:

		Nov - 2015				
		IM Adjustment		Usage		Collections
		(\$ per therm)	×	(therms)	=	(\$)
Line No.						
1	Residential (301)	0.09285		4,942,079		458,872.04
2	Small Commerical (302)	0.08111		2,906,241		235,725.21
3	Medium Commerical (352)	0.08111		906,525		73,528.24
4	Firm Lg General Sales (303)	0.03603		627,301		22,601.66
5	Firm Lg General Transportation (313)	0.03603		1,687,136		60,787.51
6	Firm Resale (310)	0.03603		-		-
7	Interruptible Lg General Sales (304)	0.00901		14,471		130.38
8	Interruptible Lg General Transportation (314)	0.00901		7,724,143		69,594.53
10	Total				-	\$ 921,239.57

458,872.04
235,725.21
73,528.24
22,601.66
60,787.51
-
130.38
69,594.53
(921,239.57)

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on January 13, 2016, 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

Hijie yetter