



Waller Lansden Dortch & Davis, LLP  
511 Union Street, Suite 2700  
P.O. Box 198966  
Nashville, TN 37219-8966

615.244.6380 main  
615.244.6804 fax  
wallerlaw.com

Paul S. Davidson  
615.850.8942 direct  
paul.davidson@wallerlaw.com

January 14, 2020

**VIA HAND DELIVERY**

Executive Director Earl Taylor  
c/o Ectory Lawless  
Tennessee Public Utility Commission  
502 Deaderick Street, Fourth Floor  
Nashville, Tennessee 37243

**Re: Piedmont Natural Gas Company, Inc. Integrity Management Rider  
Monthly Report; 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") Monthly Report for the month ending November 30, 2019.

Paragraph 7 of Piedmont's Service Schedule 317 requires monthly IMR 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 IMR monthly report for the month ended November 30, 2019.

This material is also being filed today by way of email to the Tennessee Public Utility Commission docket manager, Ectory Lawless. 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.

Thank you for your assistance with this matter. If you have any questions regarding this filing, you may reach me at the number shown above.

Very truly yours,

Paul S. Davidson

Enclosures

cc: Pia Powers  
Bruce Barkley  
Michelle Mairs  
Emily Knight

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

RECEIVED

JAN 14 2020

Schedule 1

TN PUBLIC UTILITY COMMISSION  
DOCKET OFFICE

Cumulative Integrity Management Investment Amount

Actual Integrity Management Investment, by Integrity Project Type

		Current Vintage Year: Vintage Year 8		All Vintage Years	
Line No.		November 2019 Capital Expenditure <sup>1</sup>	Prior Cumulative Capital Expenditure <sup>2</sup>	Cumulative Capital Expenditure as of November 2019 <sup>3</sup>	Cumulative Capital Expenditure as of November 2019 <sup>6</sup>
<i>TN Direct</i>					
1	Corrosion Control	\$ 151,896.10	\$ -	\$ 151,896.10	\$ 8,093,619.53
2	Casing Remediation	\$ -	\$ -	\$ -	\$ 877,274.85
3	Distribution Integrity	\$ 1,206,294.33	\$ -	\$ 1,206,294.33	\$ 87,121,609.01
4	Transmission Integrity	\$ 3,705,074.27	\$ -	\$ 3,705,074.27	\$ 214,976,313.63
5	Total	\$ 5,063,264.70	\$ -	\$ 5,063,264.70	\$ 311,068,817.02
<i>Joint Property: CO3-State</i>					
6	OASIS Project (Work & Asset Management System)	\$ -	\$ -	\$ -	\$ 133,880,060.70
7	TN % of CO-3 for Current Month <sup>4</sup>	15.80%			
8	Total Allocated to TN	\$ -	\$ -	\$ -	\$ 23,535,435.31
9	Total Capital Expenditures [Line 5 + Line 8]	\$ 5,063,264.70	\$ -	\$ 5,063,264.70	\$ 334,604,252.33
10	Less: Amount Included in the Attrition Period <sup>5</sup>	\$ -	\$ -	\$ -	\$ 32,900,000.00
11	Total Integrity Management Investment	\$ 5,063,264.70	\$ -	\$ 5,063,264.70	\$ 301,704,252.33

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, 3, 4, 5, 6 and 7 which captures amounts through 10/31/19, is \$296,640,987.63 (\$100,306,282.52 for Vintage Year 1, \$53,974,676.19 for Vintage Year 2, \$18,441,896.09 for Vintage Year 3, \$20,076,717.97 for Vintage Year 4, \$38,244,253.18 for Vintage Year 5, \$27,564,238.09 for Vintage Year 6 and \$38,032,923.59 for Vintage Year 7).

**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	November 2019
1	TIMP-Transmission Integrity	F0228443	17	Line ILI Retrofit	3,984.10
2	TIMP-Transmission Integrity	F0229405	17	Line 203 Anomalies ILI Excavations	1,086,562.91
3	TIMP-Transmission Integrity	F0231014	17	ILI anomaly excavations on Line 307	18,133.69
4	TIMP-Transmission Integrity	F0231279	17	Level 1 dig repair on Line 308 imme	78,436.46
5	TIMP-Transmission Integrity	FP1733398	17	South Nashville 20"	4,455.00
6	TIMP-Transmission Integrity	FP1734119	17	Line 307 Replacement	494,962.87
7	TIMP-Transmission Integrity	FP1734120	17	Line 431 Replacement	(32,994.63)
8	TIMP-Transmission Integrity	FP1734142	17	Line 308 Replacement	16,473.74
9	TIMP-Transmission Integrity	FP1734394	17	Line 431 Ph II Land	2,035,060.13
10	DIMP-Distribution Integrity	F0215064	17	Elizabethan Rd Valve Replacement	(494.08)
11	DIMP-Distribution Integrity	F0215066	17	Maplewood Rd Valve	2,072.97
12	DIMP-Distribution Integrity	F0222124	17	Harding Pl & Granny White Pk Valve	150.06
13	DIMP-Distribution Integrity	F0222727	17	Brick Church Pike to West Trinity	7,484.61
14	DIMP-Distribution Integrity	F0224311	17	Hermitage Pressure Downgrade	140,470.43
15	DIMP-Distribution Integrity	F0224339	17	Greenbrier Main Replacement	57,281.53
16	DIMP-Distribution Integrity	F0224345	17	4934 Whites Creek Pk	26,039.93
17	DIMP-Distribution Integrity	F0224357	17	Patton Ave	52,270.33
18	DIMP-Distribution Integrity	F0224363	17	Maxon Ave Main Replacement	62,862.49
19	DIMP-Distribution Integrity	F0225698	17	Centennial Blvd Main Replacement	1,253.68
20	DIMP-Distribution Integrity	F0225786	17	Woodcrest Leak Repair	5,493.86
21	DIMP-Distribution Integrity	F0226414	17	Line 304 Convert to Dist (Station)	787,418.68
22	DIMP-Distribution Integrity	F0227045	17	Highway 76 Valve Replacement	(968.34)
23	DIMP-Distribution Integrity	F0228466	17	Dr. Walter S Davis Valve Removal	(5,745.88)
24	DIMP-Distribution Integrity	F0229053	17	Culvert Street Creek Bore	(19,739.36)
25	DIMP-Distribution Integrity	F0229092	17	39th Ave North	215.04
26	DIMP-Distribution Integrity	FP1733615	17	Sutton Hill Rd - Replacement	(786.01)
27	DIMP-Distribution Integrity	FP1733639	17	Morena St - Insertion	(1,381.54)
28	DIMP-Distribution Integrity	FP1733763	17	Harding Place	7,960.65
29	DIMP-Distribution Integrity	FP1733764	17	Sunnyside Drive	(1,510.70)
30	DIMP-Distribution Integrity	FP1734378	17	Overton Lea DIMP	(5,146.33)
31	DIMP-Distribution Integrity	FP1734401	17	Tallwood Dr. Across Briley Pkwy	45,304.43
32	DIMP-Distribution Integrity	FP1734427	17	Gristead Place	71,895.31
33	DIMP-Distribution Integrity	FP1734428	17	Broadmoor Drive	138,760.95
34	DIMP-Distribution Integrity	FP1734432	17	Visco Dt	(175,927.43)
35	DIMP-Distribution Integrity	FP1734672	17	12th Ave N at Grundy St.	(2,055.01)
36	DIMP-Distribution Integrity	FP1734690	17	Belmont Pit Regulator Replacement a	(4,511.90)
37	DIMP-Distribution Integrity	FP1734692	17	California Ave #1817	(2,468.10)
38	DIMP-Distribution Integrity	FP1734695	17	Spence Lane	33,412.64
39	DIMP-Distribution Integrity	FP1734726	17	Cowan St HP Distribution Pipeline	4,940.32
40	DIMP-Distribution Integrity	FP1734812	17	Haverford Ave.	(10,680.38)
41	DIMP-Distribution Integrity	FP1734824	17	Childrens Way	(7,578.52)
42	CORR-Corrosion Control	F0214742	17	Dickerson Rd @ Shevel St	(5,097.12)
43	CORR-Corrosion Control	F0228699	17	Nashville Anode Bed	997.21
44	CORR-Corrosion Control	F0228798	17	Hillsboro Rd. Rectifier&Ground Bed	8,378.19
45	CORR-Corrosion Control	F0229657	17	461 Paragon Mills Rd. Bridge Attach	50,067.80
46	CORR-Corrosion Control	F0229673	17	Overton Rd. at 685 Hill Rd. Bridge	29,868.64
47	CORR-Corrosion Control	F0229691	17	Harding Road at Richland Creek and	21,218.54
48	CORR-Corrosion Control	F0229716	17	Bridge Attach 4578 Stewart Ferry	46,462.84
49	<b>Total (unallocated)</b>				<b>\$ 5,063,264.70</b>
	<i>subtotal: TN Direct (unallocated)</i>				<i>\$ 5,063,264.70</i>
	<i>subtotal: CO-3 (unallocated)</i>				<i>\$ -</i>
					<b>\$ 5,063,264.70</b>

**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. 0253139**

<u>Line No.</u>			<u>Nov-19</u>
1	Beginning Balance	<i>Prior Month's IMR Report</i>	\$ (6,248,078.36)
2	IMR Revenue Recognition	<i>Prior Annual IMR Report</i>	2,247,984.34
3	(Collections from IM Adjustment)	<i>see Separate Schedule</i>	(2,639,203.09)
4	Ending Balance Before Interest	<i>sum Lines 1 thru 3</i>	(6,639,297.11)
5	Average Balance	<i>(Line 1 + Line 4) / 2</i>	(6,443,687.74)
6	Accrued Interest	<i>Line 5 * Line 9</i>	(29,106.14)
7	Ending Balance After Interest	<i>Line 4 + Line 6</i>	\$ (6,668,403.25)
8	Applicable Annual Interest Rate	<i>same as for ACA</i>	0.054200
9	Monthly Interest Rate	<i>Line 8 / 12</i>	0.004517
10	Actual GL #0253139 EOM Balance	<i>per GL</i>	\$ (6,668,403.25)
11	Variance	<i>Line 7 - Line 10</i>	\$ -

**Journal Entry: To Record Revenue**

47136 0253139 GA489 PTOP	2,247,984.34
47136 0480000 GA489 PTOP 0526 RESVAL	(1,340,787.78)
47136 0481200 GA489 PTOP 0526 COMSTD	(701,371.11)
47136 0481000 GA489 PTOP 0526 INDSLS	(30,325.31)
47136 0483011 GA489 PTOP 0526 GASRSL	(629.44)
47136 0489000 GA489 PTOP 0526 BOTHRV	(174,870.70)

**Journal Entry: To Record Interest**

47136 0253139 GA626 PTOP	(29,106.14)
47136 0431150 GA626 PTOP 0526	29,106.14

**General Ledger Support**

**Integrity Management Deferred Account Adjustment Recorded for the Month**

Calculation of the IM Adjustment Collections:

		Nov-19		
Line No.		IM Adjustment (\$ per therm)	x Usage (therms)	= Collections (\$)
1	Residential (301)	0.14605	10,086,725	1,473,166.19
2	Small General Sales (302)	0.12759	4,731,896	603,742.61
3	Medium General Sales (352)	0.12759	1,998,425	254,979.05
4	Experimental Motor Vehicle Fuel (343/352)	0.12759	672	85.74
5	Firm Lg General Sales (303)	0.05667	969,311	54,930.85
6	Experimental Motor Vehicle Fuel (343/303)	0.05667	32,643	1,849.88
7	Firm Lg General Transportation (313)	0.05667	1,976,390	112,002.02
8	Experimental Motor Vehicle Fuel (343/313)	0.05667	135,685	7,689.27
9	Firm Resale (310)	0.05667	4,918	278.70
10	Interruptible Lg General Sales (304)	0.01417	34,525	489.22
11	Interruptible Lg General Transportation (314)	0.01417	9,173,575	129,989.56
12	<b>Total</b>			<b>\$ 2,639,203.09</b>

**Journal Entry: To Record Collections**

47136 0480000 GA489 PTOP 0526 RESVAL	1,473,166.19
47136 0481200 GA489 PTOP 0526 COMSTD	603,742.61
47136 0481200 GA489 PTOP 0526 COMSTD	255,064.79
47136 0481000 GA489 PTOP 0526 INDSL	56,780.73
47136 0489000 GA489 PTOP 0526 BOTHRV	119,691.29
47136 0483011 GA489 PTOP 0526 GASRSL	278.70
47136 0481000 GA489 PTOP 0526 INDSL	489.22
47136 0489000 GA489 PTOP 0526 BOTHRV	129,989.56
47136 0253139 GA489 PTOP	(2,639,203.09)
	-