Electronically Filed in TPUC Docket Room on June 15, 2020 at 1:06 p.m.



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

June 15, 2020

Via Email and U.S. Mail

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 is Piedmont Natural Gas Company, Inc.'s ("Piedmont" or the "Company") Integrity Management Rider ("IMR") Monthly Report for the month ending April 30, 2020.

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 April 30, 2020.

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 of each and provide us a "filed" stamped copy of each either by email, or return copy via U.S. Mail. I have enclosed a self-addressed, postage prepaid envelope should you choose the mail option.

Very truly yours,

Paul S. Davidson

PSD:cdg

cc: Bruce Barkley
Pia Powers
Michelle Mairs
Alex Bradley
Daniel Whitaker
James Jeffries

State of Tennessee

Piedmont Natural Gas Company, Inc.

Integrity Management Rider

Schedule 1

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

		Current Vintage Year: Vintage Year 8						A	All Vintage Years	
Line No.			· ·		Prior Cumulative Capital Expenditure ²		Cumulative Capital Expenditure as of April 2020 ³		Cumulative Capital Expenditure as of April 2020 ⁶	
	TN Direct		7.525.22		522 562 00		524 405 44	•	0.470.040.54	
1	Corrosion Control	\$	7,626.22	\$	523,568.89	\$	531,195.11	\$	8,472,918.54	
2	Casing Remediation	\$	425.70	Ş	(9.64)	Ş	416.06	Ş	877,690.91	
3	Distribution Integrity	\$	1,501,352.06	\$	4,987,401.38	\$	6,488,753.44	\$	92,404,068.12	
4	Transmission Integrity	\$	5,447,540.70	\$	14,061,757.88	\$	19,509,298.58	\$	230,780,537.94	
5	Total	\$	6,956,944.68	\$	19,572,718.51	\$	26,529,663.19	\$	332,535,215.51	
	Joint Property: CO3-State									
6	OASIS Project (Work & Asset Management System)	\$	-	\$	-	\$	-	\$	133,880,060.70	
7	TN % of CO-3 for Current Month ⁴		15.65%							
8	Total Allocated to TN	\$	-	\$	-	\$	-	\$	23,535,435.31	
9	Total Capital Expenditures [Line 5 + Line 8]	\$	6,956,944.68	\$	19,572,718.51	\$	26,529,663.19	\$	356,070,650.82	
10	Less: Amount Included in the Attrition Period ⁵	\$	-	\$	-	\$	_	\$	32,900,000.00	
11	Total Integrity Management Investment	\$	6,956,944.68	\$	19,572,718.51	\$	26,529,663.19	\$	323,170,650.82	

^{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 5, \$27,564,238.09 for Vintage Year 6 and \$38,032,923.59 for Vintage Year 7).

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	April 2020
1	CORR-Corrosion Control	F0228798	17	Hillsboro Rd. Rectifier&Ground Bed	2,401.39
2	CORR-Corrosion Control	F0229672	17	Lebanon Rd. Over Briley Parkway Bri	17.12
3	CORR-Corrosion Control	F0229681	17	East Trinity Lane at Ellington Park	23.96
4	CORR-Corrosion Control	F0229694	17	Bridge Attach Mt. Juliet Rd & I-40	22.50
5	CORR-Corrosion Control	F0229695	17	Bridge Attach Mufreesboro Rd	44.39
6	CORR-Corrosion Control	F0229701	17	Bridge Attach New Hope RD & I-40	21.29
7	CORR-Corrosion Control	F0230478	17	Bridge Attach Donelson Pike & I-40	22.50
8	CORR-Corrosion Control	F0230546	17	Bridge Attach Stewart FerryPike I40	59.95
9	CORR-Corrosion Control	FP1708010	17	Nashville Anodes	5,013.12
10	CSNG-Casing & Remediation	F0231471	17	44th Ave N @ I-40 - 8" Pipe	425.70
11	DIMP-Distribution Integrity	F0221354	17	Davidson Drive @ Charlotte Pike Valve	21,936.66
12	DIMP-Distribution Integrity	F0222727	17	Brick Church Pike to West Trinity	5,556.51
13	DIMP-Distribution Integrity	F0222865	17	Post Place Retirement and pressure	728.61
14	DIMP-Distribution Integrity	F0224311	17	Hermitage Pressure Downgrade	461,387.17
15	DIMP-Distribution Integrity	F0224337	17	Van Buren Renewel	111,753.47
16	DIMP-Distribution Integrity	F0224345	17	4934 Whites Creek Pk	10,746.47
17	DIMP-Distribution Integrity	F0224357	17	Patton Ave	15,930.43
18	DIMP-Distribution Integrity	F0224363	17	Maxon Ave Main Replacement	339.07
19	DIMP-Distribution Integrity	F0225698	17	Centennial Blvd Main Replacement	342.44
20	DIMP-Distribution Integrity	F0226414	17	Line 304 Convert to Dist (Station)	27,673.60
21	DIMP-Distribution Integrity	F0229092	17	39th Ave North	21,531.47
22	DIMP-Distribution Integrity	F0229495	17	1st ave south 12" 175# Replacement	324,690.10
23	DIMP-Distribution Integrity	F0230684	17	Bordeaux Bridge Expainsion Joint -	283.84
24	DIMP-Distribution Integrity	F0231296	17	Ed Temple Blvd DIMP	219,096.04
25	DIMP-Distribution Integrity	F0231458	17	Charlotte Ave Casing Retirement	6,467.32
26	DIMP-Distribution Integrity	FP1734419	17	Rosedale Ave	(1,476.73)
27	DIMP-Distribution Integrity	FP1734428	17	Broadmoor Drive	155,388.73
28	DIMP-Distribution Integrity	FP1734695	17	Spence Lane	103,376.62
29	DIMP-Distribution Integrity	FP1734726	17	Cowan St HP Distribution Pipeline	15,600.24
30	TIMP-Transmission Integrity	F0229405	17	Line 203 Anomalies ILI Excavations	411.69
31	TIMP-Transmission Integrity	F0230575	17	Line 384 - Valve Automation - Stati	212.86
32	TIMP-Transmission Integrity	F0231014	17	ILI anomaly excavations on Line 307	282.92
33	TIMP-Transmission Integrity	F0231279	17	Level 1 dig repair on Line 308 imme	1,854.00
34	TIMP-Transmission Integrity	F0231370	17	Line 320 ILI Retrofit	544.25
35	TIMP-Transmission Integrity	FP1733398	17	South Nashville 20"	(3,826.64
36	TIMP-Transmission Integrity	FP1734120	17	Line 431 Replacement	86,693.00
37	TIMP-Transmission Integrity	FP1734142	17	Line 308 Replacement	114,426.69
38	TIMP-Transmission Integrity	FP1734394	17	Line 431 Ph II Land	5,246,941.93

39 Total (unallocated)

subtotal: TN Direct (unallocated) subtotal: CO-3 (unallocated)

\$ 6,956,944.68

6,956,944.68

\$ -

\$ 6,956,944.68

Schedule 2

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

Schedule 3

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

Line No.			<u>Apr-20</u>
1	Beginning Balance	Prior Month's IMR Report	\$ (9,276,076.78)
2	IMR Revenue Recognition	Prior Annual IMR Report	2,069,310.80
3	(Collections from IM Adjustment)	see Separate Schedule	(2,206,225.68)
4	Ending Balance Before Interest	sum Lines 1 thru 3	(9,412,991.66)
5	Average Balance	(Line 1 + Line 4) /2	(9,344,534.22)
6	Accrued Interest	Line 5 * Line 9	(36,985.67)
7	Ending Balance After Interest	Line 4 + Line 6	\$ (9,449,977.33)
8	Applicable Annual Interest Rate	same as for ACA	0.047500
9	Monthly Interest Rate	Line 8 / 12	0.003958
10	Actual GL #0253139 EOM Balance	per GL	\$ (9,449,977.33)
11	Variance	Line 7 - Line 10	\$ -
Journal En	try: To Record Revenue		
	47136 0253139 GA489 PTOP		2,069,310.80
	47136 0480000 GA489 PTOP 0526 RESVAL		(1,234,219.73)
	47136 0481200 GA489 PTOP 0526 COMSTD		(645,624.97)
	47136 0481000 GA489 PTOP 0526 INDSLS		(27,915.00)
	47136 0483011 GA489 PTOP 0526 GASRSL		(579.41)
	47136 0489000 GA489 PTOP 0526 BOTHRV		(160,971.69)
Journal En	itry: To Record Interest		
	47136 0253139 GA626 PTOP		(36,985.67)
	47136 0431150 GA626 PTOP 0526		36,985.67

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:

				Apr-20			
		IM Adjustment	IM Adjustment Usage			Collections	
		(\$ per therm)	X	(therms)	=	(\$)	
Line No.	<u>-</u>						
1	Residential (301)	0.14605		9,363,206		1,367,496.24	
2	Small General Sales (302)	0.12759		3,484,273		444,558.39	
3	Medium General Sales (352)	0.12759		1,429,260		182,359.28	
4	Experimental Motor Vehicle Fuel (343/352)	0.12759		129		16.46	
5	Firm Lg General Sales (303)	0.05667		407,618		23,099.71	
6	Experimental Motor Vehicle Fuel (343/303)	0.05667		12,831		727.13	
7	Firm Lg General Transportation (313)	0.05667		1,363,526		77,271.02	
8	Experimental Motor Vehicle Fuel (343/313)	0.05667		130,758		7,410.06	
9	Firm Resale (310)	0.05667		2,360		133.74	
10	Interruptible Lg General Sales (304)	0.01417		15,441		218.80	
11	Interruptible Lg General Transportation (314)	0.01417		7,264,280		102,934.85	
12	Total				3	2,206,225.68	

•	47136 0480000 GA489 PTOP 0526 RESVAL	1,367,496.24
	47136 0481200 GA489 PTOP 0526 COMSTD	444,558.39
	47136 0481200 GA489 PTOP 0526 COMSTD	182,375.74
	47136 0481000 GA489 PTOP 0526 INDSLS	23,826.84
	47136 0489000 GA489 PTOP 0526 BOTHRV	84,681.08
	47136 0483011 GA489 PTOP 0526 GASRSL	133.74
	47136 0481000 GA489 PTOP 0526 INDSLS	218.80
	47136 0489000 GA489 PTOP 0526 BOTHRV	102,934.85
	47136 0253139 GA489 PTOP	(2,206,225.68)

_