



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

February 12, 2021

Via U.S. Mail and Email

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") Integrity Management Rider ("IMR") Monthly Report for the month ended December 31, 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 December 31, 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 via my assistant at denise.guye@wallerlaw.com.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Paul S. Davidson".

Paul S. Davidson

PSD:cdg
Enclosures

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

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

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

		Current Vintage Year: Vintage Year 9			All Vintage Years
Line No.		December 2020 Capital Expenditure ¹	Prior Cumulative Capital Expenditure ²	Cumulative Capital Expenditure as of December 2020 ³	Cumulative Capital Expenditure as of December 2020 ⁶
<i>TN Direct</i>					
1	Corrosion Control	\$ 562,056.83	\$ 44,066.53	\$ 606,123.36	\$ 9,231,049.40
2	Casing Remediation	\$ 288,526.42	\$ 456,486.93	\$ 745,013.35	\$ 2,685,976.30
3	Distribution Integrity	\$ 2,498,570.10	\$ 3,145,101.41	\$ 5,643,671.51	\$ 115,952,271.74
4	Transmission Integrity	\$ 1,047,544.37	\$ 2,073,040.63	\$ 3,120,585.00	\$ 256,905,795.25
5	Total	\$ 4,396,697.72	\$ 5,718,695.50	\$ 10,115,393.22	\$ 384,775,092.69
<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 ⁴	15.65%			
8	Total Allocated to TN	\$ -	\$ -	\$ -	\$ 23,535,435.31
9	Total Capital Expenditures [Line 5 + Line 8]	\$ 4,396,697.72	\$ 5,718,695.50	\$ 10,115,393.22	\$ 408,310,528.00
10	Less: Amount Included in the Attrition Period ⁵	\$ -	\$ -	\$ -	\$ 32,900,000.00
11	Total Integrity Management Investment	\$ 4,396,697.72	\$ 5,718,695.50	\$ 10,115,393.22	\$ 375,410,528.00

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, 7 and 8 which captures amounts through 10/31/20, is \$365,295,134.78 (\$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, \$38,032,923.59 for Vintage Year 7 and \$68,654,147.15 for Vintage Year 8).

Docket No. 13-00118

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

Schedule 2

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 2020
1	CORR-Corrosion Control	F0228798	17	Hillsboro Rd. Rectifier&Ground Bed	5,263.63
2	CORR-Corrosion Control	F0229662	17	Briley Pkwy @ Cumberland River Brid	333,693.05
3	CORR-Corrosion Control	F0229702	17	Bridge Attach Oak St @ Bass St	35,959.63
4	CORR-Corrosion Control	F0229704	17	Nashville Rectifier & Ground Bed	63.78
5	CORR-Corrosion Control	F0229707	17	Bridge Attach Old Hickory@RR Madis	43,871.59
6	CORR-Corrosion Control	F0229715	17	Bridge Attach Thompson Ln @ I-65	143,205.15
7	CSNG-Casing & Remediation	F0231460	17	Main Street @ I-65 Casing Removal	151,403.90
8	CSNG-Casing & Remediation	F0231471	17	44th Ave N @ I-40 - 8" Pipe	132,530.27
9	CSNG-Casing & Remediation	FP1734404	17	Casing #2670 Old Hickory Blvd - Pip	4,592.25
10	DIMP-Distribution Integrity	F0224311	17	Hermitage Pressure Downgrade	205,555.54
11	DIMP-Distribution Integrity	F0224331	17	Paragon Mills Road	431,201.40
12	DIMP-Distribution Integrity	F0224337	17	Van Buren Renewel	999.76
13	DIMP-Distribution Integrity	F0224345	17	4934 Whites Creek Pk	1,008.45
14	DIMP-Distribution Integrity	F0225698	17	Centennial Blvd Main Replacement	768.50
15	DIMP-Distribution Integrity	F0226414	17	Line 304 Convert to Dist (Station)	458.82
16	DIMP-Distribution Integrity	F0229092	17	39th Ave North	1,122.62
17	DIMP-Distribution Integrity	F0230661	17	17th Ave S Dresser Coupling Encapsu	107,990.85
18	DIMP-Distribution Integrity	F0230663	17	Ann Street and Branch St Dresser Co	86.51
19	DIMP-Distribution Integrity	F0230664	17	Doak Ave 2" and 4" DIMP	98,542.69
20	DIMP-Distribution Integrity	F0230665	17	O'Brien St and Eastboro Ave Min Re	30,896.96
21	DIMP-Distribution Integrity	F0230666	17	Old Lebanon Dirt Road Main Replacem	76,157.96
22	DIMP-Distribution Integrity	F0230667	17	Pennington Bend Station Relocation	27,189.00
23	DIMP-Distribution Integrity	F0230676	17	5285 Whites Creek Pike Exposure	14,612.64
24	DIMP-Distribution Integrity	F0230684	17	Bordeaux Bridge Expainsion Joint -	64,848.44
25	DIMP-Distribution Integrity	F0231383	17	28th Ave N	272,324.40
26	DIMP-Distribution Integrity	F0231471	17	44th Ave N @ I-40 - 8" Pipe	345.61
27	DIMP-Distribution Integrity	F0232423	17	44th Ave N at Tennessee Ave - Pipe	3,419.54
28	DIMP-Distribution Integrity	F0232430	17	255 Cherokee Road Main Replacement	271.59
29	DIMP-Distribution Integrity	F0232432	17	Trinity to Cowan St Main Replacemen	363.85
30	DIMP-Distribution Integrity	FP1734695	17	Spence Lane	682,183.76
31	DIMP-Distribution Integrity	FP1734726	17	Cowan St HP Distribution Pipeline	478,221.21
32	TIMP-Transmission Integrity	F0230575	17	Line 384 - Valve Automation - Stati	1,529.38
33	TIMP-Transmission Integrity	F0230600	17	Line 301-Valve Automation-Facil	362.23
34	TIMP-Transmission Integrity	FP1734120	17	Line 431 Replacement	11,171.11
35	TIMP-Transmission Integrity	FP1734142	17	Line 308 Replacement	585,324.64
36	TIMP-Transmission Integrity	FP1734394	17	Line 431 Ph II Land	449,157.01

37 **Total (unallocated)**

\$ 4,396,697.72

subtotal: TN Direct (unallocated)

\$ 4,396,697.72

subtotal: CO-3 (unallocated)

\$ -

\$ 4,396,697.72

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

<u>Line No.</u>			<u>Dec-20</u>
1	Beginning Balance	<i>Prior Month's IMR Report</i>	\$ (5,881,469.26)
2	IMR Revenue Recognition	<i>Prior Annual IMR Report</i>	3,891,002.18
3	(Collections from IM Adjustment)	<i>see Separate Schedule</i>	(3,144,063.80)
4	Ending Balance Before Interest	<i>sum Lines 1 thru 3</i>	(5,134,530.88)
5	Average Balance	<i>(Line 1 + Line 4) / 2</i>	(5,508,000.07)
6	Accrued Interest	<i>Line 5 * Line 9</i>	(14,915.66)
7	Ending Balance After Interest	<i>Line 4 + Line 6</i>	\$ (5,149,446.54)
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 #0253139 EOM Balance	<i>per GL</i>	\$ (5,149,446.54)
11	Variance	<i>Line 7 - Line 10</i>	\$ -

Journal Entry: To Record Revenue

47136 0253139 GA489 PTOPTOP	3,891,002.18
47136 0480000 GA489 PTOPTOP 0526 RESVAL	(2,320,749.34)
47136 0481200 GA489 PTOPTOP 0526 COMSTD	(1,213,992.68)
47136 0481000 GA489 PTOPTOP 0526 INDSLS	(52,489.62)
47136 0483011 GA489 PTOPTOP 0526 GASRSL	(1,089.48)
47136 0489000 GA489 PTOPTOP 0526 BOTHRV	(302,681.06)

Journal Entry: To Record Interest

47136 0253139 GA626 PTOPTOP	(14,915.66)
47136 0431150 GA626 PTOPTOP 0526	14,915.66

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:

		Dec-20				
		IM Adjustment		Usage	Collections	
		(\$ per therm)	x	(therms)	=	(\$)
<u>Line No.</u>						
1	Residential (301)	0.11730		16,168,512		1,896,566.46
2	Small General Sales (302)	0.10247		6,891,441		706,165.96
3	Medium General Sales (352)	0.10247		2,634,651		269,972.68
4	Experimental Motor Vehicle Fuel (343/302/352)	0.10247		3,152		322.99
5	Firm Lg General Sales (303)	0.04551		1,067,412		48,577.93
6	Experimental Motor Vehicle Fuel (343/303)	0.04551		6,495		295.59
7	Firm Lg General Transportation (313)	0.04551		2,235,305		101,728.73
8	Experimental Motor Vehicle Fuel (343/313)	0.04551		116,055		5,281.66
9	Firm Resale (310)	0.04551		9,089		413.64
10	Interruptible Lg General Sales (304)	0.01138		30,787		350.36
11	Interruptible Lg General Transportation (314)	0.01138		10,051,653		114,387.80
12	Total					\$ 3,144,063.80

Journal Entry: To Record Collections

47136 0480000 GA489 PTO5 0526 RESVAL	1,896,566.46
47136 0481200 GA489 PTO5 0526 COMSTD	706,165.96
47136 0481200 GA489 PTO5 0526 COMSTD	270,295.67
47136 0481000 GA489 PTO5 0526 INDSLS	48,873.52
47136 0489000 GA489 PTO5 0526 BOTHRV	107,010.39
47136 0483011 GA489 PTO5 0526 GASRSL	413.64
47136 0481000 GA489 PTO5 0526 INDSLS	350.36
47136 0489000 GA489 PTO5 0526 BOTHRV	114,387.80
47136 0253139 GA489 PTO5	(3,144,063.80)
	-