



Waller Lansden Dortch & Davis, LLP
511 Union Street, Suite 2700
P.O. Box 198966
Nashville, TN 37219-8966
Paul S. Davidson
615.850.8942 direct
paul.davidson@wallerlaw.com
615.244.6380 main
615.244.6804 fax
wallerlaw.com

May 14, 2020

Via Hand Delivery 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 March 31, 2021. 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 March 31, 2021.

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 email to 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

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

Schedule 1

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

		Current Year: CY 2021		
<u>Line No.</u>		<u>March 2021 Capital Expenditure ¹</u>	<u>Prior Cumulative Capital Expenditure ²</u>	<u>Cumulative Capital Expenditure as of <u>March 2021</u></u>
<i>TN Direct</i>				
1	Corrosion Control	\$ 22,099.92	\$ 15,835.85	\$ 37,935.77
2	Casing Remediation	\$ 75,165.18	\$ 149,301.28	\$ 224,466.46
3	Distribution Integrity	\$ 3,520,455.36	\$ 4,599,622.68	\$ 8,120,078.04
4	Transmission Integrity	\$ 327,045.31	\$ 497,634.36	\$ 824,679.67
5	Total	\$ 3,944,765.77	\$ 5,262,394.17	\$ 9,207,159.94
<i>Joint Property: CO3-State</i>				
6	OASIS Project (Work & Asset Management System)	\$ -	\$ -	\$ -
7	TN % of CO-3 for Current Month ³	16.19%		
8	Total Allocated to TN	\$ -	\$ -	\$ -
9	Total Capital Expenditures [Line 5 + Line 8]	\$ 3,944,765.77	\$ 5,262,394.17	\$ 9,207,159.94
10	Less: Amount Included in the Attrition Period	\$ 3,944,765.77	\$ 5,262,394.17	\$ 9,207,159.94
11	Total Integrity Management Investment	\$ -	\$ -	\$ -

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 calendar year that is subject to this rider. The CY 2021 cumulative amount is shown to aid comparison to the Attrition Period amount in Docket No. 20-00086. The Attrition Period in Docket No. 20-00086 covered the 12-month period ended 12/31/2021. The amount of TIMP-Transmission Integrity, DIMP-Distribution Integrity, CSNG-Casing & Remediation and CORR-Corrosion Control capital investment included in the Total Attrition Period for that proceeding was \$34,521,347.

3/ Represents the TN% of Total Company Gas Plant Excluding Joint Property, which is updated annually

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	March 2021
1	CORR-Corrosion Control	F0228798	17	Hillsboro Rd. Rectifier&Ground Bed	301.33
2	CORR-Corrosion Control	F0232416	17	Paragon Mills New Rectifier & Groun	10,103.00
3	CORR-Corrosion Control	F0233500	17	LTE Modem Upgrade Remote Mon PNOV	47.59
4	CORR-Corrosion Control	FP1734186	17	Nashville New Rectifier & Ground B	11,648.00
5	CSNG-Casing & Remediation	F0231462	17	Greenbrier Casing (3) Removal	8,470.41
6	CSNG-Casing & Remediation	F0231471	17	44th Ave N @ 1-40 - 8" Pipe	35,036.45
7	CSNG-Casing & Remediation	FP1734404	17	Casing #2670 Old Hickory Blvd - Pip	31,658.32
8	DIMP-Distribution Integrity	F0221354	17	Davidson Drive @ Charlotte Pike Valve	(24,719.53)
9	DIMP-Distribution Integrity	F0222865	17	Post Place Retirement and pressure	(16,854.44)
10	DIMP-Distribution Integrity	F0224311	17	Hermitage Pressure Downgrade	278,555.13
11	DIMP-Distribution Integrity	F0224331	17	Paragon Mills Road	516,886.47
12	DIMP-Distribution Integrity	F0225698	17	Centennial Blvd Main Replacement	35.03
13	DIMP-Distribution Integrity	F0225786	17	Woodcrest Leak Repair	44.71
14	DIMP-Distribution Integrity	F0229092	17	39th Ave North	47,240.87
15	DIMP-Distribution Integrity	F0230661	17	17th Ave S Dresser Coupling Encapsu	(374.22)
16	DIMP-Distribution Integrity	F0230664	17	Doak Ave 2" and 4" DIMP	146,042.29
17	DIMP-Distribution Integrity	F0230665	17	O'Brien St and Eastboro Ave Min Re	(994.26)
18	DIMP-Distribution Integrity	F0230666	17	Old Lebanon Dirt Road Main Replacem	(18,248.37)
19	DIMP-Distribution Integrity	F0230667	17	Pennington Bend Station Relocation	516,189.46
20	DIMP-Distribution Integrity	F0230670	17	MAIN CONSTRUCTION CHARTER PROJECTS	14,256.14
21	DIMP-Distribution Integrity	F0230684	17	Bordeaux Bridge Expainsion Joint -	158,933.27
22	DIMP-Distribution Integrity	F0231383	17	28th Ave N	410,593.81
23	DIMP-Distribution Integrity	F0232423	17	44th Ave N at Tennessee Ave - Pipe	39,798.92
24	DIMP-Distribution Integrity	F0232430	17	255 Cherokee Road Main Replacement	2,381.72
25	DIMP-Distribution Integrity	F0232432	17	Trinity to Cowan St Main Replacemen	3,941.12
26	DIMP-Distribution Integrity	F0232434	17	Main Construction Charter Projects	16,831.28
27	DIMP-Distribution Integrity	F0232436	17	MAIN CONSTRUCTION CHARTER PROJECTS	1,450.07
28	DIMP-Distribution Integrity	F0232975	17	MAIN CONSTRUCTION CHARTER PROJECTS	98,985.94
29	DIMP-Distribution Integrity	F0233033	17	Main Construction Charter Project	260.58
30	DIMP-Distribution Integrity	F0233719	17	Colonial Pipeline Tap Cut Out	4,346.14
31	DIMP-Distribution Integrity	FP1734429	17	MAIN CONSTRUCTION CHARTER PROJECTS	9,049.12
32	DIMP-Distribution Integrity	FP1734569	17	Enviro Science DIMP Project	(5,426.46)
33	DIMP-Distribution Integrity	FP1734695	17	Spence Lane	197,054.69
34	DIMP-Distribution Integrity	FP1734726	17	Cowan St HP Distribution Pipeline	1,122,465.71
35	DIMP-Distribution Integrity	FP1734799	17	Nashville Bridge Attachments	1,730.17
36	TIMP-Transmission Integrity	F0230575	17	Line 384 - Valve Automation - Stati	132.26
37	TIMP-Transmission Integrity	F0230600	17	Line 301-Valve Automation-Facil	75,775.86
38	TIMP-Transmission Integrity	F0232503	17	Line 203 MAOP Reconfirmation - Pipe	111.55
39	TIMP-Transmission Integrity	FP1733463	17	Nashville ILI Retrofit-Bordeau	(44,688.82)
40	TIMP-Transmission Integrity	FP1734142	17	Line 308 Replacement	201,566.93
41	TIMP-Transmission Integrity	FP1734394	17	Line 431 Ph II Land	94,147.53

42 **Total (unallocated)** **\$ 3,944,765.77**

subtotal: TN Direct (unallocated) \$ 3,944,765.77

subtotal: CO-3 (unallocated) \$ -

\$ 3,944,765.77

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>Mar-21</u>
1	Beginning Balance	<i>Prior Month's IMR Report</i>	\$ (2,173,996.04)
2	IMR Revenue Recognition	<i>Prior Annual IMR Report</i>	-
3	(Collections from IM Adjustment)	<i>see Separate Schedule</i>	1,194,022.54
4	Ending Balance Before Interest	<i>sum Lines 1 thru 3</i>	(979,973.50)
5	Average Balance	<i>(Line 1 + Line 4) / 2</i>	(1,576,984.77)
6	Accrued Interest	<i>Line 5 * Line 9</i>	(4,270.47)
7	Ending Balance After Interest	<i>Line 4 + Line 6</i>	\$ (984,243.97)
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>	\$ (984,243.97)
11	Variance	<i>Line 7 - Line 10</i>	\$ 0.00

Journal Entry: To Record Revenue

47136 0253139 GA489 PTOPTOP	-
47136 0480000 GA489 PTOPTOP 0526 RESVAL	-
47136 0481200 GA489 PTOPTOP 0526 COMSTD	-
47136 0481000 GA489 PTOPTOP 0526 INDSLS	-
47136 0483011 GA489 PTOPTOP 0526 GASRSL	-
47136 0489000 GA489 PTOPTOP 0526 BOTHRV	-

Journal Entry: To Record Interest

47136 0253139 GA626 PTOPTOP	(4,270.47)
47136 0431150 GA626 PTOPTOP 0526	4,270.47

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:

		Mar-21				
		IM Adjustment		Usage	Collections	
		(\$ per therm)	x	(therms)	=	(\$)
<u>Line No.</u>						
1	Residential (301)	(0.03699)		20,872,553		(772,075.74)
2	Small General Sales (302)	(0.03231)		8,095,579		(261,568.16)
3	Medium General Sales (352)	(0.03231)		2,863,645		(92,524.37)
4	Experimental Motor Vehicle Fuel (343/302/352)	(0.03231)		3,500		(113.09)
5	Firm Lg General Sales (303)	(0.01435)		719,975		(10,331.64)
6	Experimental Motor Vehicle Fuel (343/303)	(0.01435)		2,651		(38.04)
7	Firm Lg General Transportation (313)	(0.01435)		1,742,846		(25,009.84)
8	Experimental Motor Vehicle Fuel (343/313)	(0.01435)		151,812		(2,178.50)
9	Firm Resale (310)	(0.01435)		-		-
10	Interruptible Lg General Sales (304)	(0.00359)		22,017		(79.04)
11	Interruptible Lg General Transportation (314)	(0.00359)		8,385,551		(30,104.12)
12	Total					\$ (1,194,022.54)

Journal Entry: To Record Collections

47136 0480000 GA489 PTOP 0526 RESVAL	(772,075.74)
47136 0481200 GA489 PTOP 0526 COMSTD	(261,568.16)
47136 0481200 GA489 PTOP 0526 COMSTD	(92,637.46)
47136 0481000 GA489 PTOP 0526 INDLSL	(10,369.68)
47136 0489000 GA489 PTOP 0526 BOTHRV	(27,188.34)
47136 0483011 GA489 PTOP 0526 GASRSL	-
47136 0481000 GA489 PTOP 0526 INDLSL	(79.04)
47136 0489000 GA489 PTOP 0526 BOTHRV	(30,104.12)
47136 0253139 GA489 PTOP	1,194,022.54
	-