

**IN THE TENNESSEE REGULATORY AUTHORITY
AT NASHVILLE, TENNESSEE**

IN RE:

**PETITION OF PIEDMONT NATURAL GAS)
COMPANY, INC. FOR APPROVAL OF AN)
INTEGRITY MANAGEMENT RIDER TO ITS)
APPROVED RATE SCHEDULES AND)
SERVICE REGULATIONS)**

DOCKET NO. 13-00118

PETITION TO INTERVENE

Robert E. Cooper, Jr., Attorney General and Reporter for the State of Tennessee, by and through the Consumer Advocate and Protection Division of the Office of the Attorney General (“Consumer Advocate”), pursuant to Tenn. Code Ann. § 65-4-118, respectfully petitions the Tennessee Regulatory Authority (“TRA” or “Authority”) to grant the Consumer Advocate’s intervention into this proceeding on behalf of consumers and the public interest, because the Integrity Management Rider (“IMR”) proposed by Piedmont Natural Gas Company, Inc. (“Piedmont”) may affect the interests of consumers.

For cause, Petitioner would show as follows:

1. The Consumer Advocate is authorized by Tenn. Code Ann. § 65-4-118 to represent the interests of Tennessee consumers of public utilities services by initiating and intervening as a party in proceedings before the Authority in accordance with the Uniform Administrative Procedures Act and Authority rules.
2. Piedmont is a public utility regulated by the Authority and provides natural gas utilities services to consumers located in the State of Tennessee.
3. Piedmont proposes to implement an IMR mechanism in its tariffs to allow it to recover from consumers certain costs associated with capital expenditures incurred to comply with pipeline safety regulations governing Piedmont's natural gas transmission and distribution

facilities, including regulations promulgated by the United States Department of Transportation and commonly known as the Transmission Integrity Management Program (“TIMP”) and Distribution Integrity Management Program (“DIMP”).

4. Piedmont asserts that it has invested approximately \$78 million in new capital in Tennessee since the effective date of rates in its last rate case for TIMP and DIMP compliance.

5. Piedmont proposes the IMR so that it can start immediate recovery of costs associated with its capital investments for federal and state pipeline safety requirements – costs such as depreciation, taxes, and return – between general rate case filings.

6. If adopted and approved, the IMR will affect the rates that consumers pay Piedmont for natural gas utilities services in Tennessee.

7. Only by participating in this proceeding can the Consumer Advocate work adequately to protect the interests of consumers.

WHEREFORE, Petitioner requests the Authority to grant the Petition to Intervene.

RESPECTFULLY SUBMITTED,



ROBERT E. COOPER, JR. (BPR #010934)
Attorney General and Reporter
State of Tennessee



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CERTIFICATE OF SERVICE


I hereby certify that a true and correct copy of the foregoing was served via U.S. Mail or electronic mail upon:

Jane Lewis-Raymond
Vice President & General Counsel
Piedmont Natural Gas Company, Inc.
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This the 30th day of September, 2013.



JOE SHIRLEY