

# **BASS**

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January 10, 2014

**VIA HAND DELIVERY**

Executive Director Earl Taylor  
c/o Sharla Dillon  
Tennessee Regulatory Authority  
502 Deaderick Street, Fourth Floor  
Nashville, Tennessee 37243

Re: ***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**

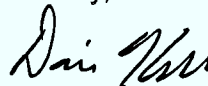
Dear Mr. Taylor:

Enclosed please find an original and five (5) copies of Piedmont Natural Gas Company's Affidavit of David R. Carpenter.

This material is also being filed today by way of email to the Tennessee Regulatory Authority docket manager, Sharla Dillon. Please file the original and four copies of each filing and stamp the additional copies as "filed." Then please return the stamped copy to me by way of our courier.

Should you have any questions concerning this matter, please do not hesitate to contact me at the email address or telephone number listed above.

Sincerely,



David Killion

cc: James H. Jeffries, IV  
Joe Shirley, Consumer Advocate and Protection Division

12643106.1

BEFORE THE TENNESSEE REGULATORY AUTHORITY

NASHVILLE, TENNESSE

DOCKET NO. 13-00118

In the Matter of:

Petition of Piedmont Natural Gas  
Company, Inc. for Approval of an  
Integrity Management Rider to its  
Approved Rate Schedules and Service  
Regulations

AFFIDAVIT OF DAVID R. CARPENTER

The undersigned, being duly sworn, deposes and says:

1. I am a citizen and resident of Mecklenburg County, North Carolina.
2. I am neither an infant nor incompetent and have personal knowledge of the matters discussed herein.
3. I am employed by Piedmont Natural Gas Company ("Piedmont") as the Vice President – Planning and Regulatory Affairs.
4. I prefiled direct and supplemental testimony in this proceeding and appeared as a witness for Piedmont at the December 18, 2013 hearing of this matter.
5. At the hearing, and in reference to implementation of Piedmont's proposed IMR mechanism on January 1, 2014, I was asked the following question by Director Hilliard:  
  
"It's my understanding that this is brought about by changes in federal regulation and the average cost to the consumer would be roughly about \$5.16 a year or \$.43 a month, which is fairly negligible?"
6. My answer to Director Hilliard was:  
  
"That's accurate, yes, sir."


7. Upon further reflection following the close of the hearing, I have come to the conclusion that my answer to Director Hilliard's question was not completely accurate. Specifically, while it is true that the need for IMR implementation has been brought about by changes in federal regulation and that the cost figures cited by Director Hilliard would be fairly negligible, it is not true that the projected impact on average customers will be \$5.16 a year and \$.43 a month.

8. At the time of this answer, I had not independently calculated the average impact of the proposed IMR mechanism implementation on residential customers. When I heard Director Hilliard's question, it was my assumption that someone had made that calculation for Director Hilliard and that it was accurate. Accordingly, I agreed with the estimate. That agreement was a mistake.

9. Upon further reflection and upon review of the hearing transcript, I realized my error. I have now calculated the impact on an average residential customer of the implementation of the IMR effective January 1, 2014 and that impact is approximately \$4.23 a month.

10. I regret not catching this mistake at the hearing but wanted to correct my misstatement for the record.

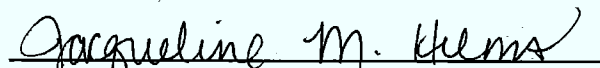
This the 9<sup>th</sup> day of January, 2014.

  
David R. Carpenter

Mecklenburg County, North Carolina

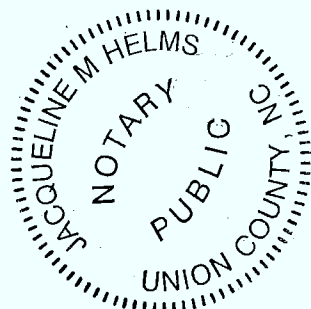
Signed and sworn to before me this day by David R. Carpenter

Date: 1/9/2014

  
Jacqueline M. Helms, Notary Public

(Official Seal)

My commission expires: November 29, 2016

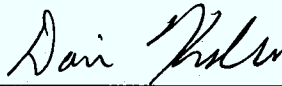


**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the attached document was served upon the parties in this action by electronic mail and by depositing a copy of the same in the United States Mail, First Class Postage Prepaid, addressed as follows:

Joe Shirley  
Senior Counsel  
Office of the Attorney General  
Consumer Advocate and Protection Division  
Post Office Box 20207  
Nashville, Tennessee 37202  
joe.shirley@ag.tn.gov

This the 10<sup>th</sup> day of January, 2014.

  
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