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BEFORE THE TENNESSEE REGULATORY AUTHORITY

2014 APR -2 PM 3:34

IN RE:

PETITION OF PIEDMONT NATURAL
GAS COMPANY, INC. FOR
ACCOUNTING ORDER

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T.R.A. DOCKET ROOM

DOCKET NO. 13-00119

PARTY STAFF'S REQUEST FOR PERMISSION TO REPLY

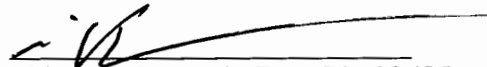
Comes now the Tennessee Regulatory Authority ("TRA" or "Authority") Staff Participating as a Party ("Party Staff") by and through counsel and respectfully submits the following Request for Permission to Reply.

1. On March 21, 2014, Piedmont Natural Gas Company, Inc. ("Piedmont") filed Piedmont Natural Gas Company, Inc.'s Motion for Leave to File Response and Response ("Response").
2. On March 28, 2014, the Hearing Officer granted Piedmont's Response and entered an Order Granting Piedmont's Motion for Leave to File a Response to Party Staff's Objection.
3. Party staff did not oppose Piedmont's Response.
4. However, Party Staff has determined that imprecise wording in Party Staff's Objection to Piedmont Natural Gas, Inc.'s Motion for Summary Judgment has been misunderstood by Piedmont. This misinterpretation is in danger of being compounded if Piedmont's Response is allowed without Reply.
5. Additionally, Party Staff would assert that Piedmont mischaracterizes the nature of the disagreement about the facts in this case as "conflicting interpretations of and legal

conclusions about undisputed facts.”¹

6. This matter is not currently set for hearing and as such Piedmont will not be prejudiced by the entry of a Reply in this matter.
7. For the forgoing reasons Party Staff should be allowed to enter the attached Reply.

Respectfully submitted,



Shiva K. Bozarth, BPR No.22685
Legal Counsel
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243

¹ *Piedmont Natural Gas Company Inc. 's Motion for Leave to File Response and Response*, ¶ 9

CERTIFICATE OF SERVICE

The undersigned hereby certifies that I have served a copy of the foregoing document on the following persons by U.S. Mail:

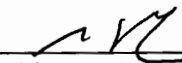
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This the 2nd day of April, 2014.



Shiva K. Bozarth