

BEFORE THE TENNESSEE REGULATORY AUTHORITY

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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

MOTION TO INTERVENE

Comes now the Tennessee Regulatory Authority ("TRA" or "Authority") Staff Participating as a Party ("Party Staff") by and through counsel and requests that the Hearing Officer appointed by the Directors on October 29, 2013, issue an Order allowing Party Staff to intervene in this matter. Party Staff further requests that the Hearing Officer set a procedural schedule in this matter that allows Party Staff to conduct discovery and file testimony if necessary. In support of this request Party Staff would show as follows:

1. The Authority has the power to "investigate, upon its own initiative... any public utility as defined in § 65-4-101."¹
2. The Authority "[m]ay upon motion allow any interested person to intervene and become a party to a contested case."²
3. Piedmont's petition in this matter requests certain changes to its deferred Actual Cost Adjustment ("ACA") account.
4. TRA Staff sent a data request to Piedmont Natural Gas Company, Inc. ("Piedmont") on October 29, 2013, requesting additional information from Atmos. On November 5, 2013, Piedmont filed a response to the data request that stated that "[t]his docket is not a case

¹ Tenn. Code Ann. § 65-4-117(a).

² Tenn. Code Ann. § 65-2-107.

where Piedmont seeks to retrade concessions made knowingly and consciously in a prior settlement with Staff.”

5. Party Staff asserts that the Authority should deny this request and hold that Piedmont is attempting to alter the settlement terms reached in TRA Docket No. 07-00174.
6. Party Staff asserts that its participation in this docket as a party is essential to ensuring that all necessary discovery is conducted and that the necessary issues are raised before the Authority.

PRAYER FOR RELIEF

7. Party Staff requests that they be granted intervention in this matter and that the procedural schedule be amended to allow all parties sufficient time to adequately participate.

Respectfully submitted,



Shiva K. Bozarth, BPR No.22685
Legal Counsel
Tennessee Regulatory Authority
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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 21st day of November, 2013.



Shiva K. Bozarth