

BASS

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January 17, 2014

VIA HAND DELIVERY

Executive Director Earl Taylor
c/o Sharla Dillon
Tennessee Regulatory Authority
502 Deaderick Street, 4th Floor
Nashville, Tennessee 37243

Re: ***In re: Petition of Piedmont Natural Gas Company, Inc. for Accounting Order
Docket No. 13-00119***

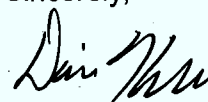
Dear Mr. Taylor:

Enclosed please find an original and five (5) copies of Piedmont Natural Gas Company, Inc's Discovery Requests to Party Staff.

This material is also being filed electronically today by way of email to the Tennessee Regulatory Authority docket manager, Sharla Dillon. Please file the original and four copies of this material and stamp the additional copy 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
Shiva K. Bozarth

12702030.1

2. Each Data Request calls for all knowledge and Documents in the possession, custody and control of the Party Staff, including all information and Documents in the possession of its attorneys, agents, or representatives. When asked to answer an interrogatory, the request pertains to information within your actual or constructive possession, control, or

custody, including information which may be held by your attorneys, representatives, and all persons acting under, by, or through you, or subject to your control or supervision, and all persons acting on your behalf.

3. Documents that are responsive to a particular Data Request should be labeled with the corresponding number of the Data Request.

4. Where all or a portion of a Document is responsive to one or more of these Data Requests, produce the entire Document together with any attachments or exhibits thereto.

5. Whenever you object to a particular Data Request, or portion thereof, respond to the extent you have not objected.

6. If you object to providing a response to an interrogatory, in whole or in part, on the grounds of privilege, provide your objection in writing with sufficient specificity to permit a determination concerning the validity of the claim of privilege, together with the factual and legal basis for each objection asserted. If you object to providing a response in part, respond to that portion of the interrogatory to which no objection is made.

7. If you cannot fully answer any interrogatory, then you should answer such interrogatory to the fullest extent possible, and should indicate the reason for failing to answer fully.

8. In each instance in which you aver insufficient knowledge or information as a grounds for not providing information or for providing only a portion of the information requested by an interrogatory, please set forth a description of the efforts made to locate information needed to answer the interrogatory. In addition, identify each person, if any, who is known by you to have such knowledge.

DEFINITIONS

1. "You" or "your" or "Party Staff" refers to the members of the TRA Staff designated as interveners in this proceeding and any other person acting on the Party Staff's behalf or subject to its control, now or in the past.

2. "Document" is intended to have the broadest permissible meaning and includes, without limitation, the original and all copies of all communications and any written, printed, electronically recorded, typed or graphic matter of any kind or nature however produced or reproduced, and whether or not claimed to be privileged or otherwise excludable from discovery; specifically, including but not limited to, notes; letters; correspondence; memoranda; books of any character; summaries or records of telephone conversations; summaries or records of personal conversations; diaries; routing slips or memoranda; reports and notebooks; periodicals; publications; invoices; bills; receipts; specifications; shipping papers; purchase orders; minutes or records of meetings; reports and/or summaries of interviews; agreements and contracts; electronic recordings; audio and video tapes; journals; ledgers; or any other type of data compilation from which information can be obtained and translated, if necessary, by you through computers, detection devices or any other mechanical device into reasonably usable form.

3. "Person" means any natural person, corporation, partnership, business, governmental body, and all types and kinds of entities of any kind.

4. "Communication" includes without limitation, any oral, electronic, visual, or written exchange of work, thoughts, ideas or Documents between persons or entities by any means.

5. Any reference to a filing or Order means a filing or Order in this Proceeding unless otherwise indicated.

6. "Proceeding" refers to TRA Docket No. 13-00119, Petition of Piedmont Natural Gas Company, Inc. to Adjust the June 30, 2012 ACA Ending Balance for prior Period Adjustments.

7. "Identify" or "identification" when used in reference to a natural person means to provide that person's full name, present or last known business address (or, if no business address, home address), and that person's employer and position at the time in question with respect to the particular interrogatory involved.

8. "Identify" or "identification" when used in reference to a Document means to provide the title, date, author, signatories, recipients, a general description of such Document sufficient to permit it to be identified with particularity in a request for the production of Documents, the present or last known location of such Document, and the identity of the person or persons having custody, control, or possession thereof.

9. The singular form of a noun or pronoun shall be considered to include within its meaning the plural form of the noun or pronoun so used, and vice versa; and the use of any tense of any verb shall be considered to include also within its meaning all other tenses of the verb so used.

10. Whenever the terms "all", "any" or "each" are used herein, each of these terms shall be construed to include each of the other terms.

11. The connectives "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the discovery all responses which might otherwise be construed to be outside of its scope.

12. "Proposed Adjustments" means the five (5) proposed adjustments to Piedmont's ACA account reflected and described on Exhibits A and B to Piedmont's Petition in this proceeding.

DATA REQUESTS

1. Please provide a detailed explanation of the factual and legal basis and reasoning underlying the assertion in Party Staff's Motion to Intervene in this Proceeding that "Piedmont is attempting to alter the settlement terms reached in TRA Docket No. 07-00174" by its Petition in this Docket.

2. Please identify and produce all Documents supporting, evidencing, relating, or referring to Party Staff's assertion that "Piedmont is attempting to alter the settlement terms reached in TRA Docket No. 07-00174".

3. With respect to each of the five (5) discrete Proposed Adjustments reflected and discussed on Exhibits A and B to Piedmont's Petition in this proceeding, please:

a. State whether Party Staff believes that such adjustments represent legitimate gas costs eligible for inclusion in Piedmont's ACA account but for Party Staff's contention that they are barred by the 2006 ACA Joint Final Report of Audit Staff and Piedmont Natural Gas Company? If Party Staff contends that such costs are not legitimate gas costs eligible for inclusion in Piedmont's ACA account, please explain Party Staff's conclusions in this regard.

b. State Party Staff's position on each of the individual Proposed Adjustments as to whether it is barred by the Joint Final Report of Audit Staff and Piedmont Natural Gas Company?

c. State whether Party Staff challenges the factual nature and accounting basis for each of Piedmont's Proposed Adjustments and, if so, please describe Party Staff's position on the factual nature and accounting basis for Staff's proposed treatment of these adjustments and identify and produce all documents supporting, evidencing, relating, or referring to Party Staff's position.

d. State the date upon and explain the circumstances under which Party Staff became aware of Piedmont's accounting and factual contentions relative to the basis for Piedmont's Proposed Adjustments.

e. Identify and produce all Documents supporting, evidencing, relating, or referring to Party Staff's discovery of the existence and basis for each of Piedmont's discrete Proposed Adjustments.

f. Explain the legal basis upon which Party Staff relies in contending that Piedmont's Proposed Adjustments are barred by the Joint Final Report of Audit Staff and Piedmont Natural Gas Company.

4. Please state whether Party Staff agrees with Piedmont's treatment of the \$793,087.45 in additional adjustments in favor of customers that Piedmont has already made and that are discussed in footnote 1 to the Petition on page 4 thereof?

5. Please state whether Party Staff's opposition to the Proposed Adjustments in this proceeding would continue or be the same if the Proposed Adjustments reflected a net \$3.67 million ACA account adjustment in favor of Piedmont's customers.

6. Please describe each instance during the last 5 years that Party Staff is aware of in which TRA audit staff has been presented with or taken a position on a proposed prior period adjustment of gas costs for any natural gas local distribution company regulated by the TRA and with respect to each such instance, please provide the docket number, nature of the adjustment, Party Staff's position on the adjustment, and whether the adjustment was allowed by the TRA.

This the 17th day of January, 2014.



R. Dale Grimes (#6223)
Bass, Berry and Sims PLC
150 Third Avenue South, Suite 2800
Nashville, Tennessee 37201
(615) 742-6244

- and -

James H. Jeffries IV

OF COUNSEL:

Moore & Van Allen, PLLC
100 N. Tryon Street, Suite 4700
Charlotte, North Carolina 28202-4003
Telephone: 704-331-1079

***Attorneys for Piedmont Natural Gas
Company, Inc.***

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

Shiva K. Bozarth
Legal Counsel
Tennessee Regulatory Authority
502 Deadrick Street, 4th Floor
Nashville, Tennessee 37243
Shiva.K.Bozarth@tn.gov

This the 17th day of January, 2014.

