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BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE
JAN 14 2014

IN RE:

T.R.A. DOCKET ROOM

PETITION OF PIEDMONT NATURAL GAS
COMPANY, INC. TO ADJUST THE JUNE 30,
2012 ACA ENDING BALANCE FOR PRIOR
PERIOD ADJUSTMENTS

Docket No. 13-00119

**JOINT MOTION FOR EXTENSION OF TIME
TO FILE STATEMENT OF STIPULATED FACTS**

Piedmont Natural Gas Company, Inc. ("Piedmont" or the "Company") and Party Staff (collectively the "Moving Parties"), through counsel and pursuant to Rule 1220-1-1-.11 of the Rules of the Tennessee Regulatory Authority ("Authority"), hereby respectfully request that the Authority grant them an extension of time to file a statement of stipulated facts to and until February 21, 2014. In support of this request, the Moving Parties respectfully show unto the Authority as follows:

1. On January 10, 2014 the Authority issued its Order Establishing Procedural Schedule ("Procedural Order") in this proceeding in which it provided for discovery and an opportunity for the Parties to file a statement of stipulated facts prior to submitting dispositive motions, if any, on certain preliminary issues identified in the Procedural Order ("Preliminary Issues").
2. Consistent with the time schedule set forth in the Procedural Order, Piedmont and Party Staff have recently completed the process of issuing and responding to data requests from the other party. To date, the Consumer Advocate and Protection Division of the Attorney General's Office ("CAPD") has not participated in discovery.
3. Under the Procedural Order, statements of stipulated facts in this proceeding are due to be filed with the Authority on February 12, 2014.

4. Due to the extensive efforts required to respond to each other's discovery requests, and other matters, the Moving Parties have not been able to complete the preparation of a statement of stipulated facts in sufficient time for filing by tomorrow – the date they are currently due.

5. The purpose of the statement of stipulated facts is to agree, to the maximum extent possible, on the facts underlying the disputes in this docket in order to establish those facts on the record and to facilitate the Authority's resolution of anticipated dispositive motions on the Preliminary Issues currently scheduled to be filed on February 26, 2014.

6. The Moving Parties continue to believe that the filing of a statement of stipulated facts is possible and would be beneficial to the efficient resolution of the Preliminary Issues in this docket and respectfully seek an extension of time for such filing to and until February 21, 2014.

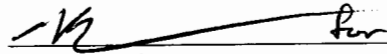
7. The Moving Parties do not seek an extension of any other dates in the Procedural Order and submit that no party will be prejudiced by the relief requested herein.

8. The undersigned counsel for the Moving Parties are authorized to represent that the CAPD has no objection to the relief sought herein.

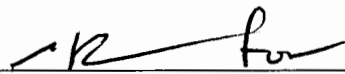
WHEREFORE, for the reasons set forth above, Piedmont and Party Staff respectfully request that the Authority issue an order granting the parties to this proceeding to and until February 21, 2014 in which to file a statement of stipulated facts in this proceeding.

Respectfully submitted, this the 11th day of February, 2014.

Piedmont Natural Gas Company, Inc.

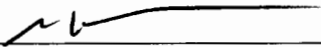


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