filed electronically in docket office on 12/08/14

BASS BERRY + SIMS.

A PROFESSIONAL LIMITED LIABILITY COMPANY ATTORNEYS AT LAW

TEL: (615) 742-6244 150 TH FAX: (615) 742-2744 dgrimes@bassberry.com

R. DALE GRIMES

150 THIRD AVENUE SOUTH, SUITE 2800 NASHVILLE, TN 37201 (615) 742-6200 KNOXVILLE MEMPHIS WASHINGTON, D.C.

OTHER OFFICES:

www.bassberry.com

December 5, 2014

Via Hand-Delivery

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

> Re: Petition of Piedmont Natural Gas, Inc. for Approval of a CNG Infrastructure Rider to Its Approved Rate Schedules and Service Regulations Docket No. 14-00086

Dear Mr. Taylor:

I enclose an original and five (5) copies of the public version of Piedmont Natural Gas Company, Inc.'s Supplemental Responses to Tennessee Fuel and Convenience Store Association's Supplemental Discovery Requests.

This material is also being filed by way of email to the Tennessee Regulatory Authority Docket Manager, Sharla Dillon. Filed along with this material are four copies of the Confidential material responsive to the Discovery Requests, submitted under seal, containing Confidential Supplemental Response #25, 26 and 38, in a separate envelope.

Please file the original and four copies of the public version of this filing 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.

With kindest regards, I remain

Very truly yours,

7.17 Junier

R. Dale Grimes

Enclosures

cc: Melvin Malone, Esq.

Wayne Irvin, Esq.

Sharla Dillon (via email)

## PIEDMONT NATURAL GAS COMPANY, INC. SUPPLEMENTAL DISCOVERY RESPONSES CNG IR

## TRA DOCKET NOS. 14-00086 & 14-00087 TENNESSEE FUEL AND CONVENIENCE STORE ASSOC.

8. Identify any matters (and provide copies of filings and orders for each) in which a Commission, Court, Judge and/or any other regulating authority approved or denied CNG cost recovery mechanisms or their equivalents.

Response: Piedmont currently offers CNG service in Tennessee, North Carolina and South Carolina as a fully regulated utility service and has done so for many years; nothing in this docket seeks to change that. In each of these states, the rate schedule under which Piedmont has and continues to provide CNG sales/transportation service was approved by the applicable state public service commissions. In Tennessee CNG sales service was approved in Docket No. 11-00144 by Authority Order dated April 8, 2012. In NC and SC, CNG service has been available as a tariffed utility service since at least the 1990s (Piedmont has not been able to locate the precise dockets in which CNG rate schedules were first approved in NC and SC).

Response provided by Piedmont Natural Gas on December 5, 2014.

## **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:

Counsel f	or Tennessee	Fuel &	Convenience
Store Ass	oc.		

Melvin J. Malone Butler Snow Suite 1600 150 Third Avenue South Nashville, TN 37201 Counsel for the Consumer Advocate and Protection Division of the Office of the Attorney General

Wayne Irvin
Assistant Attorney General
Office of the Tennessee Attorney General
Consumer Advocate and Protection Division
P. O. Box 20207
Nashville, TN 37202-0207

This the 5<sup>th</sup> day of December, 2014.

P. Pluins