

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

IN RE:)	
)	
PETITION OF PIEDMONT NATURAL GAS)	
COMPANY, INC. FOR APPROVAL OF)	Docket No. 14-00086
A CNG INFRASTRUCTURE RIDER TO ITS)	
APPROVED RATE SCHEDULES AND SERVICE)	
REGULATIONS)	
)	

**DISCOVERY REQUEST OF PIEDMONT NATURAL GAS
TO THE TENNESSEE FUEL AND CONVENIENCE STORE ASSOCIATION**

Pursuant to the Order Establishing Procedural Schedule issued by the Hearing Officer on October 1, 2014, Rules 26, 33, 34 and 36 of the Tennessee Rules of Civil Procedure and Tenn. Comp. R & Reg. 1220-1-2-.11, Piedmont Natural Gas Company, Inc. ("Piedmont" or the "Company") hereby submits the following Interrogatories and Requests for Production ("Data Requests") upon the Tennessee Fuel and Convenience Store Association ("TFCA"). Piedmont requests that the TFCA respond to the following Data Requests under oath and in accordance with the Instructions and Definitions below by January 3, 2015. The TFCA's responses and Documents should be produced at the offices of Bass, Berry & Sims PLC, 150 Third Avenue South, Suite 2800, Nashville, TN 37201, Attn: R. Dale Grimes.

INSTRUCTIONS

1. These data requests are continuing in nature, and are to be supplemented or amended promptly if information is received or a position held by the TFCA changes, which would make a prior response or production of documents inaccurate, incomplete, or incorrect.
2. Each data request calls for all knowledge and documents in the possession, custody and control of the TFCA, including all information and documents in the possession of your 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. All documents produced shall be consecutively numbered on each page with alphanumeric characters identifying your company and with numerical characters identifying the page.
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, you must 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. Further, you should provide all available information relating to the interrogatory and should identify the person or persons who can more fully answer such interrogatory.
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.

9. If a data request specifically calls for an answer in response rather than the production of documents, an answer is required. The production of documents will not suffice.

DEFINITIONS

1. "You" or "your" or "TFCA" refers to the Tennessee Fuel and Convenience Store Association, its officers, employees, agents, or representatives during the period of time covered by the data request, and any other person acting on the TFCA'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. 14-00086, Petition of Piedmont Natural Gas Company, Inc. for Approval of a CNG Infrastructure Rider to Its Approved Rate Schedules and Service Regulations.
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.

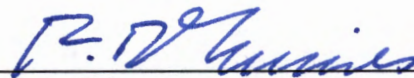
DATA REQUESTS

1. Reference Carr's testimony, p. 17. Why would the so-called cross-subsidization problem continue to exist if Piedmont converted its CNG business to an unregulated business where the unregulated entity would buy the CNG assets from Piedmont?
2. Reference Carr's testimony, p. 9-10. Identify any and all additional support for Carr's conclusion that a subsidy is inconsistent with the intent of the legislation establishing TCA sec. 65-5-103(d).
3. Reference Carr's testimony, p. 14. Identify and describe in detail any and all similarities between the petroleum industry referenced in the Statement of Purpose for the Petroleum Trade Practices Act and the CNG market in Tennessee.
4. Reference Carr's testimony, p. 15. Identify and describe in detail any analysis or assessment of the current CNG market in Tennessee conducted by witness Carr to support his conclusion that Piedmont's proposal would act as a barrier to entry for other potential entrants in the CNG fueling industry. Also, please produce all documents, studies, data and analyses relied upon by Carr to reach this conclusion.
5. Explain whether the TFCA considers the current CNG market in Tennessee to be a mature market with robust competition.
6. Reference Carr's testimony, p. 15. What is the rate that is appropriate so there is no subsidization?
7. What was the specific error by the TRA in approving Rate Schedule 342 in Docket No. 11-00144?
8. Identify and describe in detail any and all experience of TFCA's witnesses with the development of alternative fuel markets in general or CNG in particular.
9. Identify and describe in detail any and all experience of TFCA's witnesses with the use of natural gas as a vehicle fuel including, but not limited to, academic, consultative or operational.
10. Identify all reports, studies, data and analyses relied upon by TFCA witnesses to support the conclusion that the TRA should treat retail CNG vehicle fuel as an unregulated service.

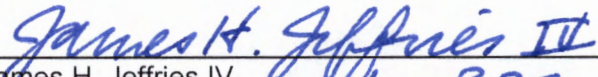
11. Explain TFCA's position as to why Tennessee legislators specifically passed new legislation authorizing alternative methods for regulated utilities to recover alternative fuel infrastructure equipment and costs.
12. Explain TFCA's position as to under what circumstances a utility could recover infrastructure capital costs consistent with the intent of TCA sec. 65-5-103(d).
12. Identify and produce any and all documents reviewed by TFCA witnesses in preparation for the filing of their testimony.
13. Identify and produce any and all documents constituting written work product and/or testimony by the TFCA's witnesses related to CNG.
14. Reference Jones' testimony, p. 7-8. Identify and describe in detail any and all additional support for Jones' conclusion that TCA sec. 65-5-103(d) does not allow recovery from ratepayers' costs incurred in constructing or operating CNG motor fuel stations.

This the 18th day of December, 2014.

Piedmont Natural Gas Company, Inc.



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



James H. Jeffries IV
Brian S. Heslin
Moore & Van Allen, PLLC
100 N. Tryon Street, Suite 4700
Charlotte, North Carolina 28202-4003
Telephone: (704)-331-1079

by RDG
w/permission

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 for Tennessee Fuel & Convenience Store Assoc. 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 18th day of December, 2014.

