

**IN THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

IN RE:)	
)	
TARIFF TO REVISE THE)	
NATURAL GAS VEHICLE FUEL)	DOCKET NO. 14-00087
TARIFF AND INTRODUCE AN)	
EXPERIMENTAL MOTOR)	
VEHICLE FUEL SERVICE TARIFF)	

PETITION TO INTERVENE

Robert E. Cooper, Jr., Attorney General and Reporter for the State of Tennessee, by and through the Consumer Advocate and Protection Division of the Office of the Attorney General ("Consumer Advocate"), pursuant to Tenn. Code Ann. § 65-4-118, respectfully petitions the Tennessee Regulatory Authority ("TRA" or "Authority") to grant the Consumer Advocate's intervention into this proceeding on behalf of the public interest, because consumers may be adversely affected by the Petition of Piedmont Natural Gas Company, Inc. regarding a Tariff to Revise the Natural Gas Vehicle Fuel Tariff and Introduce an Experimental Motor Vehicle Fuel Service Tariff ("Petition") filed in this TRA Docket by Piedmont Natural Gas Company, Inc. ("Piedmont" or "Utility"). For cause, the Consumer Advocate would show as follows:

1. The Consumer Advocate is authorized by Tenn. Code Ann. § 65-4-118 to represent the interests of Tennessee consumers of public utility services by initiating and intervening as a party in proceedings before the Authority in accordance with the Uniform Administrative Procedures Act and Authority rules.

2. Piedmont is a public utility regulated by the Authority and is engaged in the business of transporting, distributing, and selling natural gas in the State of Tennessee.

3. On September 4, 2014, Piedmont filed the Petition requesting approval from the TRA of proposed new Rate Schedule 343 (Experimental Motor Vehicle Fuel Service) and changes to Rate Schedule 342 (Natural Gas Vehicle Fuel) (“Rate Schedules”), as well as the applicable rate components to those Rate Schedules as reflected on revision sheets attached to the Utility’s tariff.¹

4. Piedmont asserts that the “revised and new Rate Schedules are related to Piedmont’s provision of natural gas to customers as a motor fuel. New Rate Schedule 343 is being submitted as an Experimental Motor Vehicle Fuel Service to all existing and qualified potential customers.”² Piedmont further states that the “purpose of the experimental rate schedule is to determine the relative need for sales/transportation service for natural gas vehicles and to determine whether the Company’s existing facilities can accommodate the market demands of that service.”³

5. With the Petition, the Utility filed copies of the proposed new and revised Rate Schedules.⁴

6. As to the timing of consideration by the Authority and the effectiveness of Piedmont’s requests, Piedmont in the Petition requests an effective date of

¹ Petition, cover letter, page 1, paragraph 1.

² Petition, cover letter, page 1, paragraph 2.

³ Id.

⁴ Attachments to the Petition described herein as the Rate Schedules.

October 1, 2014, for the approval of the tariff changes described and set out in the Petition and Rate Schedules.⁵ On September 15, 2014, at its regular conference, the Authority suspended the effectiveness of the proposed new and revised Rate Schedules.

7. In this matter, the Consumer Advocate seeks to represent the interests of consumers served by Piedmont. The interests of consumers, including without limitation the proposed new rates and changes in rates which would result from the approval of the tariff changes described and set out in the Petition and Rate Schedules, may be affected by determinations and orders made by the Authority in this TRA Docket.

8. Only by participating in this proceeding can the Consumer Advocate work adequately to protect the interests of consumers.

WHEREFORE, Petitioner respectfully asks the Authority to grant this Petition to Intervene.

[signature page follows]

⁵ Petition, cover letter, page 1, paragraph 1.

RESPECTFULLY SUBMITTED,



ROBERT E. COOPER, JR. (BPR #010934)
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Dated: Sept 18, 2014.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served via U.S. Mail or electronic mail upon:

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This the 18th day of Sept, 2014.



Wayne Irvin