

IN THE TENNESSEE REGULATORY AUTHORITY
AT NASHVILLE, TENNESSEE

IN RE:)	
)	
PETITION OF PIEDMONT)	
NATURAL GAS, INC. FOR)	DOCKET NO. 16-00140
APPROVAL OF AN INTEGRITY)	
MANAGEMENT RIDER TO ITS)	
APPROVED RATE SCHEDULES)	
AND SERVICE REGULATIONS)	

PETITION TO INTERVENE

Herbert H. Slatery III, Attorney General and Reporter for the State of Tennessee, by and through the Consumer Protection and Advocate 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) to grant the Consumer Advocate's intervention into this proceeding because consumers' interests, rights, duties or privileges may be determined or affected by the *Petition of Piedmont Natural Gas, Inc. for Approval of an Integrity Management Rider to its Approved Rate Schedules and Service Regulations (Petition)* filed in this TRA Docket by Piedmont Natural Gas, Inc. (Piedmont). For cause, Petitioner 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 utilities services by initiating and intervening as a party in any matter or proceeding before the TRA in accordance with the Uniform Administrative Procedures Act, Tenn. Code Ann. § 4-5-101 *et seq.*, and TRA rules.

2. Piedmont is a public utility regulated by the TRA and provides natural gas to approximately 196,346¹ customers in Tennessee. Piedmont's principal office is located at 4720 Piedmont Row Drive, Charlotte, NC 28210.

3. On August 30, 2013, Piedmont filed a Petition in TRA Docket No. 13-00118, seeking approval of an Integrity Management Rider (IMR) within its rate and pursuant to Tenn. Code Ann. § 65-5-103. The IMR, as approved by the TRA, allows Piedmont to recover from consumers certain costs associated with capital expenditures incurred to comply with pipeline safety regulations governing Piedmont's natural gas transmission and distribution facilities.² The Consumer Advocate intervened in that docket and after extensive negotiation and discovery entered into a stipulation with Piedmont on November 27, 2013, which formed part of the basis of the approval of the IMR by the TRA.

4. Subsequent to the approval of the IMR in Docket No. 13-00118, Piedmont filed TRA Docket Nos. 14-00147 and 15-00116, which were the annual filings required by the Stipulation in Docket No. 13-00118 to adjust rates for each following year. Pursuant to the Stipulation, the Consumer Advocate did not intervene in either of these dockets, and the TRA approved revised tariffs pursuant to those filings. Piedmont's current filing in TRA Docket No. 16-00140 is in the same vein as Docket Nos. 14-00147 and 15-00116.

5. The interests of consumers, including without limitation the proposed increase in rates to be paid by Piedmont's consumers under this filing, may be affected by determinations and orders made by the TRA with respect to (a) the interpretation, application, and implementation of Tenn. Code Ann. § 65-5-103 and other relevant statutory and regulatory provisions and (b) the

¹ This customer count comes from TRA Docket No. 11-00144, the last rate case filed by Piedmont.

² Order Granting Petition, TRA Docket No. 13-00118, at Page 2.

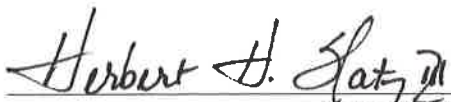
review and analysis of the documentation, financial spreadsheets, and materials provided by Piedmont.

6. In the TRA's Order Granting Petition³, the TRA stated that "[a]fter three (3) years from the effective date of the initial IMR, provides that any interested party may petition the Authority to reconsider the public interest aspect of the IMR." The effective date of the IMR was January 1, 2014.

7. Only by participating as a party in this proceeding can the Consumer Advocate adequately carry out its statutory duty to represent the interests of Tennessee consumers.

WHEREFORE, the Consumer Advocate respectfully asks the TRA to grant this Petition to Intervene.

RESPECTFULLY SUBMITTED,



HERBERT H. SLATTERY III (BPR #09077)
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State of Tennessee



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³ TRA Docket No. 13-00118, (May 13, 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 29 day of December, 2016.



Daniel P. Whitaker III