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TN PUBLIC UTILITY COMMISSION  
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Waller Lansden Dortch & Davis, LLP  
511 Union Street, Suite 2700 615.244.6380 main  
P.O. Box 198966 615.244.6804 fax  
Nashville, TN 37219-8966 wallerlaw.com

Paul S. Davidson  
615.850.8942 direct  
paul.davidson@wallerlaw.com

February 9, 2018

Via Hand-Delivery

The Honorable Earl Taylor  
Tennessee Regulatory Authority  
c/o Sharla Dillon  
502 Deaderick Street, Fourth Floor  
Nashville, Tennessee 37423

**Re: *Petition of Piedmont Natural Gas Company, Inc. for Approval of an Integrity Management Rider to its Approved Rate Schedules and Service Regulations***  
***Docket No. 17-00138***

Dear Mr. Taylor:

Enclosed please find an original and five (5) copies of Piedmont Natural Gas Company, Inc.'s ("Piedmont") initial responses to the Consumer Protection and Advocate Division's Supplemental Discovery Requests dated February 1, 2018 in the above-captioned docket.

This material is also being filed today by way of email to the Tennessee Regulatory Authority docket manager, Sharla Dillon. Please file the original and four copies and stamp the additional copy as "filed." Then please return the additional stamped copy to me by way of our courier.

Please note that the attachments and one narrative response have been marked CONFIDENTIAL. Piedmont requests that these be treated as such pursuant to the September 27, 2013 Protective Order filed in Docket No. 13-00118.

Should you have any questions concerning this matter, please do not hesitate to contact me at the email address or telephone number listed above.

Sincerely,



Paul S. Davidson

Enclosure

cc: Bruce Barkley  
Pia Powers  
Jim Jeffries, IV

4836-2651-3756.1

**Piedmont Natural Gas Company, Inc.**  
**Docket No. 17-00138**  
**Supplemental Discovery Request of the Consumer Advocate**  
**Date Issued: February 1, 2018**

7. Provide an update to the balance of the deferred over/under recovery as of the most recent month available from the appropriate general ledger account.

**Response:** The balance in the Integrity Management Deferred Account as of December 31, 2017 is an undercollection of \$6,437,795.93.

Response provided by Piedmont Natural Gas on February 8, 2018.

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8. Provide the Company's position concerning whether it is appropriate to update the deferred over/under recovered balance through December 31, 2017.

**Response:** Piedmont's position is to utilize the Integrity Management Deferred Account balance as of October 31 pursuant to tariff Rate Schedule 317 – Integrity Management Rider, Section 5.

Response provided by Piedmont Natural Gas on February 8, 2018.

**Piedmont Natural Gas Company, Inc.**  
**Docket No. 17-00138**  
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12. Indicate whether Piedmont includes any CWIP within its IMR filings. In other words, does Piedmont require that IMR investment be closed and in-service prior to inclusion within the IMR filing?

**Response:** Piedmont includes CWIP within its IMR filings.

Response provided by Piedmont Natural Gas on February 8, 2018.

**Piedmont Natural Gas Company, Inc.**  
**Docket No. 17-00138**  
**Supplemental Discovery Request of the Consumer Advocate**  
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13. If Piedmont does include CWIP within its IMR request:
- a. Provide the balance of CWIP projects comprising IMR investment as of October 31, 2017, identified by project.
  - b. For each project, identify the total cost as of December 31, 2017 and indicate whether such project was placed in service as of that date.

**Response:** See CONFIDENTIAL attachment.

Response provided by Piedmont Natural Gas on February 8, 2018.