

**IN THE TENNESSEE PUBLIC UTILITY COMMISSION  
AT NASHVILLE, TENNESSEE**

<b>IN RE:</b>	)	
	)	
<b>COMPLIANCE FILING OF PIEDMONT NATURAL GAS COMPANY, INC. REGARDNG THE IMPACT OF FEDERAL TAX REFORM ON PUBLIC UTILITY REVENUE REQUIREMENTS</b>	) ) ) ) ) ) )	<b>DOCKET NO. 18-00040</b>

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**CONSUMER ADVOCATE'S SECOND DISCOVERY REQUEST  
TO PIEDMONT NATURAL GAS COMPANY, INC.**

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To: Paul S. Davidson, Esq.  
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This Second Discovery Request is hereby served upon Piedmont Natural Gas Company, Inc. (Company), pursuant to Rules 26, 33, 34 and 36 of the Tennessee Rules of Civil Procedure and Tenn. Comp. R. & Reg. 1220-1-2-.11. The Consumer Protection and Advocate Division of the Attorney General's Office (Consumer Advocate) requests that full and complete responses be provided pursuant to the Tennessee Rules of Civil Procedure. The responses are to be produced at the Office of the Tennessee Attorney General and Reporter, Consumer Protection and Advocate Division, 315 Deaderick Street, 20<sup>th</sup> Floor, Nashville, Tennessee 37243, c/o Daniel Whitaker, **on or before 2:00 p.m. (CDT), Friday, December 14, 2018.**

### **PRELIMINARY MATTERS AND DEFINITIONS**

These additional discovery requests incorporate the same Preliminary Matters and Definitions set forth in the First Discovery Request of the Consumer Protection and Advocate Division to Piedmont Natural Gas served on October 29, 2018, and are to be considered continuing in nature, and are to be supplemented from time to time as information is received by Piedmont and any Piedmont affiliate which would make a prior response inaccurate, incomplete, or incorrect.

A number of the requests below refer to information submitted by Piedmont with a confidential designation. Pursuant to the Protective Order in this Docket, confidential information is redacted in the public version of this filing.

### **SECOND INFORMAL DISCOVERY REQUESTS**

**Confidential:** [REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

**RESPONSE:**

2. **Confidential:** [REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]



[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

**RESPONSE:**

6. To the extent state income tax rates impact the data contained in the hard-coded cells located in various cells within the TN Excess ADIT tab of Confidential Attachment 1-16, provide the calculation of the embedded state tax rates, how they were determined, and the justification for the use of a composite rate in the determination of Tennessee jurisdictional excess ADIT.

**RESPONSE:**

7. **Confidential:** [REDACTED]
- [REDACTED]
- [REDACTED]

**RESPONSE:**

8. Provide the approximate date the adjustments to true-up to the 2017 return will be identified and recorded.

**RESPONSE:**

- Confidential:** [REDACTED]
- [REDACTED]
- [REDACTED]

**RESPONSE:**

10. With respect to the response to Consumer Advocate request 1-9, confirm that there were no modifications to Piedmont's regulated balance of ADIT, or NOL, as a result of the Duke acquisition of Piedmont.

**RESPONSE:**

11. Provide a comprehensive explanation, along with all supporting calculations, supporting the state portion of corporate assets that were assigned to Tennessee as illustrated in Exhibit 3.

**RESPONSE:**

[illegible]

**RESPONSE:**

13. Regarding the Company's response to Consumer Advocate Request 1-27, provide all calculations and workpapers supporting the amounts recorded as deferred revenue by month for the period January 2018 through May 2018. These workpapers should reflect both the accrued revenue beginning in January, as well as the calculation of the reduction in federal tax expense.

**RESPONSE:**

**Confidential:** [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

**RESPONSE:**

**Confidential:** [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

**RESPONSE:**

**Confidential:** [REDACTED]  
[REDACTED]  
[REDACTED]

**RESPONSE:**

**17. Confidential:** [REDACTED]  
[REDACTED]  
[REDACTED]

**RESPONSE:**

18. Regarding the affordability of Piedmont's overall customer bill, provide the average monthly residential customer bill, along with supporting calculations and components for the period January 2014 through October 2018. Include the average cost of gas per MCF and average gas costs incurred by residential customers for 2015 – 2018 year to date. This response should include average monthly consumption volumes.

**RESPONSE:**

**RESPECTFULLY SUBMITTED,**



**DANIEL P. WHITAKER, III** (BPR#035410)

Assistant Attorney General

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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 5<sup>th</sup> day of December, 2018.

  
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**DANIEL P. WHITAKER, III**  
Assistant Attorney General