

STATE OF TENNESSEE

Office of the Attorney General



Electronically Filed in TPUC Docket Room on
March 1, 2019 at 11:48 a.m.

HERBERT H. SLATERY III
ATTORNEY GENERAL AND REPORTER

P.O. BOX 20207, NASHVILLE, TN 37202
TELEPHONE (615)741-3491
FACSIMILE (615)741-2009

March 1, 2019

Hon. Robin Morrison, Chairman
c/o Sharla Dillon
Tennessee Public Utility Commission
502 Deaderick Street, 4th Floor
Nashville, TN 37243

In re: Docket No. 18-00126, Piedmont's 2018 Integrity Management Rider

Dear Chairman Morrison:

The above-captioned Docket is scheduled for a Hearing on the Merits on March 11, 2019. In its pre-filed testimony, the Consumer Advocate highlighted two items: (1) Piedmont's cost of installing distribution mains; and (2) Piedmont's computation of the property tax expense component of the Integrity Management Rider (IMR). Only the second issue proposes a change to the Company's revenue requirement.

In light of the generic docket opened by the Commission as Docket No. 19-00007, which is designed to address changes to the IMR, the Consumer Advocate believes that in the interest of judicial economy, these issues can be addressed in the newly-opened Docket. The Parties have engaged in discussions concerning these items agree on this approach. If the Commission also approves this approach, there will be no need to conduct a contested hearing, and the Parties will appear before the Commission to announce the agreement.

Thank you for your time and consideration.

Sincerely,

A handwritten signature in blue ink, appearing to read "D. Whitaker, III".

Daniel P. Whitaker, III
Assistant Attorney General

cc: Monica Smith-Ashford, Esq. (by email)
James Jeffries, Esq. (by email)
Paul Davidson, Esq. (by email)