

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

IN RE:)	
)	
INVESTIGATION INTO PIEDMONT NATURAL GAS COMPANY, INC'S INTEGRITY MANAGEMENT RIDER))))	DOCKET NO. 19-00007

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

To: Paul S. Davidson, Esq.
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This Second Discovery Request is hereby served upon Piedmont Natural Gas Company, Inc. (Company or Piedmont), 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 Advocate Unit in the Financial Division of the Tennessee 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 Advocate Unit, Financial Division, War Memorial Building, 301 6th Avenue North,

Nashville, Tennessee 37243, c/o Daniel P. Whitaker III, on or before 2:00 p.m. (CDT), Friday, June 21, 2019.

PRELIMINARY MATTERS AND DEFINITIONS

These Additional Discovery Requests incorporate the same Preliminary Matters and Definitions as set forth in the *Consumer Advocate's First Discovery Request to Tennessee Piedmont Natural Gas Company* sent to the Company on May 16, 2019, and are to be considered continuing in nature, and are to be supplemented from time to time as information is received by the Company which would make a prior response inaccurate, incomplete, or incorrect.

SECOND DISCOVERY REQUESTS

2-1. Regarding the response to Consumer Advocate Request No. 1-5, confirm that the annualized depreciation rate applied to the OASIS asset is approximately 8.9%, which equals the summation of the Life Rate values found within the Calculations tab of the attachment. If this is not accurate, provide the actual depreciation rate applied to this asset.

RESPONSE:

2-2. Confirm that the depreciation rate applied to the OASIS asset as used in the IMR dockets is 1.45%.

RESPONSE:

2-3. Identify the proposed depreciation rates related to the OASIS asset requested by the Company and proposed by any intervenors within Piedmont's currently pending North Carolina rate case.

RESPONSE:

2-4. Regarding the response to Consumer Advocate Request No. 1-4 and Piedmont's ability to display the components of its rates on customer bills, including its IMR charges, provide a comprehensive explanation of Piedmont's ability to maintain the S2K billing system in the long-term, including its ability to attract and retain employees with expertise in COBOL.

RESPONSE:

2-5. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] (CONFIDENTIAL – Filed
under seal)

RESPONSE:

2-6. Regarding the Answered Call Rate data provided in response to Consumer Advocate Request No. 1-9, indicate whether the reports contain all Piedmont calls, or just those applicable to North Carolina customers.

RESPONSE:

2-7. To the extent Piedmont implements Tennessee IMR rates in advance of a Commission order authorizing such rate changes, provide copies of any documents, orders, rules, or any other authority relied upon by Piedmont which supports the implementation of such rates.

RESPONSE:

2-8. Regarding the response to Consumer Advocate Request No. 1-4, identify the fully loaded Operating and Maintenance cost allocated to Piedmont-Tennessee associated with maintaining the \$2K billing system in 2018. Provide a comprehensive explanation as to how this cost was determined.

RESPONSE:

2-9. For each year the IMR has been in effect, provide the date that Piedmont began implementing its new rates in customer bills.

RESPONSE:

RESPECTFULLY SUBMITTED,



DANIEL P. WHITAKER III, BPR No. 035410
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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 10th day of June, 2019.



DANIEL P. WHITAKER III