

IN THE TENNESSEE PUBLIC UTILITY COMMISSION
AT NASHVILLE, TENNESSEE

IN RE:)	
)	
PETITION OF PIEDMONT NATURAL)	
GAS, INC. FOR APPROVAL OF AN)	DOCKET NO. 19-00107
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 Advocate Unit of the Office of the Attorney General (“Consumer Advocate”), pursuant to Tenn. Code Ann. § 65-4-118, respectfully petitions the Tennessee Public Utility Commission (“TPUC” or “Commission”) 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 TPUC Docket by Piedmont Natural Gas, Inc. (“Piedmont” or “Company”). For cause, the Consumer Advocate 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 TPUC in accordance with the Uniform Administrative Procedures Act, Tenn. Code Ann. § 4-5-101 *et seq.*, and TPUC rules.

2. Piedmont is a public utility regulated by the TPUC 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 TPUC Docket No. 13-00118, seeking approval of an Integrity Management Rider ("IMR") pursuant to Tenn. Code Ann. § 65-5-103. The IMR, as approved by the TPUC, 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 TPUC.

4. Subsequent to the approval of the IMR in Docket No. 13-00118, Piedmont filed TPUC Docket Nos. 14-00147, 15-00116, 16-00140, 17-00138, and 18-00126, which were the annual filings required by the Stipulation in Docket No. 13-00118 to adjust rates for each following year. Piedmont's current filing in TPUC Docket No. 19-00107, like the prior dockets, addresses the Company's annual IMR filing for the 2019 calendar year.

5. The interests of consumers, including without limitation the proposed change in rates to be paid by Piedmont's consumers under this filing, may be affected by determinations and orders made by the TPUC 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 review and analysis of the documentation, financial spreadsheets, and materials provided by Piedmont.

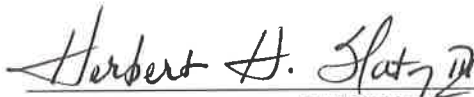
¹ This customer count comes from TPUC Docket No. 11-00144, the last rate case filed by Piedmont.

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

6. 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 TPUC to grant this Petition to Intervene.

RESPECTFULLY SUBMITTED,



HERBERT H. SLATTERY III

BPR No. 009077

Attorney General and Reporter
State of Tennessee



DANIEL P. WHITAKER III

BPR No. 035410

Assistant Attorney General
Office of the Tennessee Attorney General
Financial Division, Consumer Advocate Unit
P.O. Box 20207
Nashville, Tennessee 37202-0207
(615) 532-9299
daniel.whitaker@ag.tn.gov

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:

Paul S. Davidson, Esq.
Waller Lansden Dortch & Davis, LLP
511 Union Street, Suite 2700
P.O. Box 198966
Nashville, TN 37219-8966
(615) 850-8942
Paul.davidson@wallerlaw.com

James H. Jeffries, IV, Esq.
McGuireWoods LLP
201 North Tyron Street, Suite 3000
Charlotte, NC 28202
(704) 343-2348
jjeffries@mcquirewoods.com

This the 18th day of December, 2019.



DANIEL P. WHITAKER III
Assistant Attorney General