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June 19, 2020

*Via Electronic Filing & U.S. Mail*

Executive Director Earl Taylor  
c/o Ectory Lawless  
Tennessee Public Utility Commission  
502 Deaderick Street, Fourth Floor  
Nashville, Tennessee 37243

Re: **Piedmont Natural Gas Company, Inc.**  
**Petition for Waiver of Periodic Meter Testing Under TPUC Rule 1220-04-05-.26(1)(e)**  
**Docket No.: 20-00083**

Dear Mr. Taylor:

Enclosed please find the Petition of Piedmont Natural Gas Company, Inc. ("Piedmont" or the "Company") for Waiver of Periodic Meter Testing Under TPUC Rule 1220-04-05-.26(1)(e) and the Supporting Testimony of Company witness Pia K. Powers. Also enclosed is a check for the filing fee in the amount of \$25.00.

This material is also being filed today by way of email to the Tennessee Public Utility Commission docket manager, Ectory Lawless. Please file the original and provide us a "filed" stamped copy via email or by U.S. Mail using the enclosed postage paid envelope.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Paul S. Davidson". The signature is fluid and cursive, with a large initial "P" and "D".

Paul S. Davidson

PSD:cdg  
Enclosures

**BEFORE THE TENNESSEE PUBLIC UTILITY COMMISSION  
NASHVILLE, TENNESSEE**

IN RE:	)	
	)	
PETITION OF PIEDMONT NATURAL	)	
GAS COMPANY, INC. FOR WAIVER OF	)	
PERIODIC METER TESTING UNDER	)	Docket No. 20- <u>00083</u>
TPUC RULE 1220-04-05-.26(1)(e)	)	
	)	
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**PETITION OF PIEDMONT NATURAL GAS COMPANY, INC. FOR WAIVER OF  
PERIODIC METER TESTING UNDER TPUC RULE 1220-04-05-.26(1)(e)**

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Piedmont Natural Gas Company, Inc. (“Piedmont” or the “Company”) hereby requests that the Tennessee Public Utility Commission (“Commission” or “TPUC”) approve a waiver of the requirement that Piedmont complete its periodic meter testing obligations under TPUC Rule 1220-04-05-.26(1)(e) for the remainder of calendar year 2020. In support of this Petition, Piedmont respectfully shows unto the Commission as follows:

1. Piedmont is incorporated under the laws of the state of North Carolina and is engaged in the business of transporting, distributing, and selling natural gas in the states of Tennessee, North Carolina, and South Carolina.

2. Piedmont’s natural gas distribution business in Tennessee is subject to regulation and supervision by the Commission pursuant to Chapter 4 of Title 65 of the Tennessee Code Annotated.

3. Piedmont has its principal offices in Tennessee at 83 Century Boulevard, Nashville, Tennessee, and is engaged in the business of furnishing natural gas to customers located in Nashville and the remainder of Davidson County as well as portions of the counties of Cheatham, Dickson, Robertson, Rutherford, Sumner, Trousdale, Williamson, and Wilson and in certain incorporated towns and cities located therein.

4. Under TPUC Rule 1220-04-05-.26(1)(e), gas utilities, including Piedmont, are required to “make periodic tests of meters, associated devices and instruments, to assure their accuracy.” These tests are to be “scheduled within the calendar year” unless otherwise authorized by the Commission.

5. Piedmont has implemented a wide-ranging set of procedures to ensure the safety of the Company’s customers and employees, and of the communities served by the Company, in response to the COVID-19 public health emergency. These safety procedures are set forth in the Company’s weekly reports to the Commission filed in Docket No. 20-00047.

6. The suspension of periodic meter testing was among one of the safety procedures implemented by the Company in March 2020 to help limit the spread of COVID-19.

7. As explained in the Pre-Filed Testimony of Pia Powers in support of this Petition, Piedmont intends to take a slow and deliberate return to normal operations after the conclusion of the formally declared public health emergency, which may extend beyond 2020.

8. Because a public health emergency is currently declared through the end of June 2020, and in light of the continued uncertainty around when it will be safe to resume periodic meter testing, Piedmont now finds it reasonable and prudent to request from the TPUC a waiver of the periodic meter testing obligations under TPUC Rule 1220-04-05-.26(1)(e) for the remainder of calendar year 2020.

9. Piedmont intends to resume periodic meter sampling and testing activities in 2021, assuming COVID-19 is no longer posing a threat in the Company’s service territory.

10. Piedmont has no cause for concern that waiver of periodic meter testing for the remainder of 2020 will harm customers or increase the Company’s overall operational risk.

11. In further support of this Petition, Piedmont relies upon the Pre-Filed Testimony of Pia Powers.

12. For all of these reasons, Piedmont respectfully requests waiver of its periodic meter testing obligations pursuant to TPUC Rule 1220-04-05-.26(1)(e) for the remainder of 2020.

WHEREFORE, Piedmont Natural Gas Company, Inc., respectfully requests that the Commission waive the Company's obligation to complete periodic meter testing within this calendar year.

Respectfully submitted this 19th day of June, 2020.

**Piedmont Natural Gas Company, Inc.**

By: s/ Paul S. Davidson  
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### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing *Petition Of Piedmont Natural Gas Company, Inc. For Waiver Of Meter Testing Under TPUC Rule 1220-04-05-.26(1)(e)* is being served this date upon all of the parties to this docket electronically or by depositing a copy of the same in the United States Mail, First Class Postage Prepaid, at the addresses contained in the official service list in this proceeding.

This the 19<sup>th</sup> day of June, 2020.

/s/ Sloane K. O'Hare  
Sloane K. O'Hare