

**Before the
Tennessee Public Utility Commission**

Docket No. 20- 00083

**PETITION OF
PIEDMONT NATURAL GAS COMPANY, INC.
FOR WAIVER OF PERIODIC METER TESTING
UNDER TPUC RULE 1220-04-05-.26(1)(e)**

Testimony of Pia K. Powers

On Behalf of

Piedmont Natural Gas Company, Inc.



June 19, 2020

1 **Q. Ms. Powers, please state your name and business address.**

2 A. My name is Pia K. Powers. My business address is 4720 Piedmont Row
3 Drive, Charlotte, North Carolina.

4 **Q. By whom and in what capacity are you employed?**

5 A. I am the Managing Director of Gas Rates & Regulatory for Piedmont
6 Natural Gas Company, Inc., (“Piedmont” or “the Company”). In this
7 capacity, I am responsible for a variety of regulatory matters including the
8 development and execution of all rate requests and financial report filings
9 by Piedmont.

10 **Q. Please describe your educational and professional background.**

11 A. I graduated from Fairfield University in 1995 with a Bachelor of Arts
12 degree in economics, and subsequently earned a Master of Science degree
13 in environmental and resource economics from the University College
14 London. From 1999 through 2003, I was employed as an Economist with
15 the Energy Information Administration, the statistical agency of the U.S.
16 Department of Energy, where I focused on international energy
17 forecasting and environmental issues. I was hired by Piedmont as a
18 Regulatory Analyst in 2003, promoted to Supervisor – Federal Regulatory
19 in 2005, promoted to Manager of Regulatory Affairs in 2006, and
20 promoted to Director of Regulatory Affairs in 2013. I assumed my current
21 position as Managing Director of Gas Rates & Regulatory in 2019.

1 **Q. Have you previously testified before the Tennessee Public Utility**
2 **Commission (“Commission” or “TPUC”) or any other regulatory**
3 **authority?**

4 A. Yes. I have presented testimony before this Commission (and its
5 predecessor agency, the Tennessee Regulatory Authority), the North
6 Carolina Utilities Commission, and the Public Service Commission of
7 South Carolina on a number of occasions.

8 **Q. What is the purpose of your testimony in this proceeding?**

9 A. My testimony is filed in support of Piedmont’s request for waiver of
10 TPUC Rule 1220-04-05-.26(1)(e) with respect to periodic testing of Group
11 I and Group III meters, which are used to provide service to residential
12 and commercial customers.

13 **Q. Describe the activities the Company undertakes to comply with TPUC**
14 **Rule 1220-04-05-.26(1)(e).**

15 A. Pursuant to TPUC Rule 1220-04-05-.26(1)(e), Piedmont engages in
16 periodic testing of its in-service meters, some of which are selected
17 through statistical sampling, to ensure that they are achieving overall
18 accuracy. This statistical periodic meter sampling program (“Statistical
19 Meter Sampling Program” or “Program”) is in addition to meter testing
20 that is required at various times by the Commission’s Rules. Under the
21 Program, Piedmont tests active Group I and Group III meters that are at
22 least ten years old and which have not otherwise been tested in the last ten
23 years. Piedmont tests these meters by removing the active meter from the

1 customer's premise and performing tests on it in Piedmont's centralized
2 meter shop. At the same time the active meter is removed from the
3 customer's premise, a replacement meter is immediately installed in its
4 place. After the replacement meter is installed, a Piedmont employee (a
5 Service Technician) enters the customer's home or business to relight
6 pilots and perform safety checks to ensure that no leaks are present.

7 **Q. Is the Program safety-related?**

8 A. No. The purpose of the Program is to confirm that Piedmont's meters are
9 accurately recording usage so that customers' bills are accurate; the
10 Program does not serve as a means to ensure safety.

11 **Q. Why is the Company seeking waiver of TPUC Rule 1220-04-05-**
12 **.026(1)(e)?**

13 A. The Company's normal meter sampling and testing schedule was first
14 impacted by the emergency response and subsequent recovery initiatives
15 related to the severe weather and tornados in and around our service
16 territory in early March 2020, then further impacted in March and
17 thereafter by the spread of COVID-19. In response to calls to limit the
18 spread of COVID-19, the Company suspended certain types of non-safety
19 related fieldwork starting in March 2020. One of the suspended activities
20 was pulling meters for the Program. In light of the current pandemic
21 related to COVID-19, Piedmont is requesting that the Commission waive
22 the Company's periodic meter testing obligations under TPUC Rule 1220-
23 04-05-.26(1)(e) for the remainder of 2020.

1 The Company's request is driven out of reasonable precaution for
2 the health concerns of both its field employees (its Service Technicians)
3 and its customers. Through the relief sought in this proceeding, Piedmont
4 is seeking to protect its fully qualified Service Technicians by limiting
5 their exposure to non-critical work until the risks posed by COVID-19
6 have further stabilized. Piedmont's fully qualified Service Technicians
7 perform meter sample testing pursuant to the Program, as well as essential
8 utility work which requires their qualifications, such as meter turn-ons and
9 emergency response/service restoration. To perform the periodic meter
10 tests under the Program, Service Technicians must first acquire the active
11 meters from the field and bring them to the Company's testing facilities.
12 For Group I and Group II meters, this process involves a Service
13 Technician going to the residential or commercial premise where the
14 active meter is located, briefly stopping gas service to the customer in
15 order remove the existing meter and install a replacement meter in its
16 place, entering the customer's premise (home or business) in order to
17 relight pilots and perform safety checks before leaving the customer's
18 premise with the replacement meter in the "on" position, and then bringing
19 the old meter to Piedmont's testing facilities.

20 In response to the COVID-19 pandemic, Service Technicians
21 performing the meter swap-outs would need to wear personal protective
22 equipment and take other extraordinary protective measures when inside
23 the customer's home or business and when otherwise interfacing with the

1 customer at their premise. Even under normal (pre-pandemic) conditions,
2 periodic meter testing pursuant to the Program was not typically well
3 received by customers because it involves work that the customer did not
4 request and because it requires the customer to coordinate with the
5 Company to schedule the meter replacement and enter the customer's
6 premise.

7 Accordingly, because of the current pandemic, Piedmont does not
8 believe that it is prudent for its Service Technicians to enter customer
9 premises to conduct routine meter testing pursuant to the Program, nor
10 does the Company believe that many customers would even authorize
11 Company personnel to enter their premises to perform this nonessential
12 work at this time.

13 **Q. Does Piedmont intend to continue responding to customer calls**
14 **related to faulty or safety issues with meters on customer premises?**

15 A. Yes. Throughout the COVID-19 pandemic, Piedmont has continued
16 performing essential services, such as responding to emergencies and gas
17 odor or gas leak calls. If a customer suspects a problem with their meter
18 or other gas facilities or equipment, the Company will continue to respond
19 those requests.

20 **Q. Will customers be harmed by Piedmont's request to waive its periodic**
21 **meter testing obligation for the remainder of 2020?**

1 A. No. If an inaccurate meter is not tested in 2020, it will still remain eligible
2 for testing in 2021, and the Company will ultimately rectify and resolve
3 any identified billing inaccuracies.

4 **Q. How many meters would have been tested per Piedmont's Program in**
5 **2020?**

6 A. The aggregate number of Group I and Group III meters in Tennessee that
7 would have been removed and tested per Piedmont's Program in 2020 is
8 3,066. These removed meters would have been active meters at customer
9 premises, and accordingly, replacement meters would have been installed
10 at these customer premises. Piedmont began to pull from the field and test
11 some of these meters in early 2020 (prior to March 2020). Given the
12 pause in the Program since March 2020, it will not be feasible for
13 Piedmont to complete its 2020 meter testing requirements without
14 extraordinary action that would require deferring essential work.

15 **Q. When does the Company anticipate it will be able to resume periodic**
16 **meter testing pursuant to the Program?**

17 A. Piedmont intends to resume the Program in 2021, assuming that COVID-
18 19 is no longer posing a threat in the Company's service territory.

19 **Q. Does this conclude your testimony?**

20 A. Yes.