

IN THE TENNESSEE PUBLIC UTILITY COMMISSION
AT NASHVILLE, TENNESSEE

IN RE:)
)
PIEDMONT NATURAL GAS COMPANY,) Docket No. 20-00086
INC. PETITION FOR AN ADJUSTMENT)
OF RATES, CHARGES, AND TARIFFS)
APPLICABLE TO SERVICE IN TENNESSEE)

CONSUMER ADVOCATE'S SECOND MOTION FOR LEAVE TO ISSUE MORE
THAN FORTY DISCOVERY REQUESTS

Herbert H. Slatery III, Attorney General and Reporter for the State of Tennessee, by and through the Consumer Advocate Unit in the Financial Division of the Office of the Tennessee Attorney General ("Consumer Advocate"), pursuant to TPUC Rule 1220-1-2-.11(5)(a), hereby submits this second motion requesting permission to issue more than forty discovery requests to Piedmont Natural Gas Company, Inc. ("Piedmont" or "Company"). Pursuant to TPUC Rule 12-1-2-.11(5)(a), the Consumer Advocate seeks leave of the Hearing Officer by motion and has filed a memorandum establishing good cause for service of the additional discovery requests as well as the discovery requests themselves. The Consumer Advocate would show as follows:

1. On August 17, 2020, the Consumer Advocate issued its first round of discovery requests in this case. Along with these requests, the Consumer Advocate contemporaneously filed its *Motion for Leave to Issue More Than Forty Discovery Requests* and *Memorandum in Support of the Motion*.

2. Piedmont responded to that *Motion* on August 21, 2020, indicating that it did not object to the relief sought in the *Motion*; in other words, the Company indicated it did not object to the discovery requests based on the number of requests sought in that first round but reserved its right to file objections on other grounds.

3. On August 25, 2020, the Hearing Officer granted the Consumer Advocate's *Motion*, thereby allowing the Consumer Advocate to issue more than forty requests.

4. Pursuant to the Hearing Officer's *Order Establishing Procedural Schedule*, the Consumer Advocate has two more remaining opportunities to issue rounds of formal discovery requests, September 23 and October 21.

5. The Consumer Advocate is contemporaneously filing its *Second Discovery Requests* along with this *Motion* and the memorandum supporting it.

6. As is discussed at length in the *Memorandum in Support of the Consumer Advocate's Second Motion for Leave to Issue More Than Forty Discovery Requests*, the Consumer Advocate has good cause to issue these additional discovery requests.

WHEREFORE, the Consumer Advocate respectfully requests that the Hearing Officer grant its *Motion to Issue More Than Forty Requests* in this matter.

RESPECTFULLY SUBMITTED,

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing *Petition to Intervene* was served via U.S. Mail or electronic mail upon:

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This the 23rd day of September, 2020.

A handwritten signature in black ink, reading "D. P. Whitaker, III", written over a horizontal line.

DANIEL P. WHITAKER III
Assistant Attorney General