

STATE OF TENNESSEE

Office of the Attorney General



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October 6, 2020

Kelly Cashman-Grams  
General Counsel  
c/o Tory Lawless  
Docket Manager  
Tennessee Public Utility Commission  
502 Deaderick Street  
Nashville, TN 37243

Re: Records Request Related to Piedmont, Natural Gas Company, Inc.

Dear Ms. Cashman-Grams:

Pursuant to Tenn. Code Ann. § 65-4-118(b)(2), the Consumer Advocate Unit in the Financial Division of the Tennessee Attorney General's Office (Consumer Advocate) respectfully requests the Tennessee Public Utility Commission (TPUC) to furnish a specific record which the Consumer Advocate believes the TPUC may possess that are needed for the Consumer Advocate's analysis in TPUC Docket No. 20-00086. The record requested is as follows:

1. TPUC Docket No. 11-00144. Piedmont Natural Gas Company's (Piedmont) Additional Responses to the Commission Staff Data Request. Piedmont filed its response on October 21, 2011. The Consumer Advocate is requesting an unredacted copy of Piedmont's Response to DR 1-10. As a Party to TPUC Docket No. 11-00144, the Consumer Advocate affirms it is still subject to the Protective Order issued in TPUC Docket No. 11-00144 that was issued by the Commission on September 27, 2011. Commission Staff's DR 1-10 reads as follows:

*10. Does Piedmont receive any royalties from HomeServe related to the sale or provision of Interior Gas Line Coverage in Tennessee (royalties related to the benefit derived from the use of Piedmont's name, vice-president's signature, logo, reputation, goodwill and corporate image, etc.)? If so, please provide the amount received for the twelve months*

*ending May 31, 2011. Please provide detailed justification if n royalties were assessed or received.*

Thank you for your time and consideration of this matter. If you have questions regarding this request, please contact me at (615)741-2370.

Respectfully,



Karen H. Stachowski  
Assistant Attorney General

cc: Paul S. Davidson, Esq.  
James H. Jeffries, IV, Esq.