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Electronically Filed in TPUC Docket Room on August 21, 2020 at 12:04 p.m.

August 21, 2020

Via Email and 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.'s Response To Consumer Advocate's Motion And Memorandum In Support of Motion For Leave To Issue More Than Forty Discovery Requests;
Docket No.: 20-00086**

Dear Mr. Taylor:

Enclosed please find an original and five (5) copies of Piedmont Natural Gas Company, Inc.'s ("Piedmont" or the "Company") Response To Consumer Advocate's Motion and Memorandum In Support of Motion For Leave To Issue More than forty Discovery Requests

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 to my assistant, at denise.guye@wallerlaw.com.

Very truly yours,

Paul S. Davidson

PSD:cdg

cc: James H. Jeffries IV
Daniel Whitaker
Brian S. Heslin

**IN THE TENNESSEE PUBLIC UTILITY COMMISSION
AT NASHVILLE, TENNESSEE**

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

**RESPONSE TO CONSUMER ADVOCATE’S MOTION AND MEMORANDUM IN
SUPPORT OF MOTION FOR LEAVE TO ISSUE MORE THAN FORTY DISCOVERY
REQUESTS**

Piedmont Natural Gas Company, Inc. (“Piedmont” or “the Company”) submits this response to the Motion and Memorandum in Support of Motion for Leave to Issue More Than Forty Discovery Requests (“Motion”) filed by The Consumer Advocate Unit in the Financial Division of the Office of the Tennessee Attorney General (“Consumer Advocate”) and respectfully shows the Commission the following:

1. While Piedmont does not agree with all of the various rationales offered by the Consumer Advocate in support of its request for leave to serve more than 40 data requests in this proceeding, Piedmont has reviewed the 124 individual data requests (not counting parts and subparts) set forth in the “Consumer Advocate’s First (Informal) Discovery Request to Piedmont Natural Gas Company” and does not object to the immediate relief sought in the Motion - authorization to serve and receive Piedmont’s responses to those individual requests.

2. Piedmont’s notice of non-objection is not intended to and does not waive its right to object to individual requests contained in the Consumer Advocate’s First (Informal) Discovery Request to Piedmont Natural Gas on grounds other than the fact they exceed 40 in number.

3. Similarly, Piedmont does not waive its rights to object to future discovery requests of the Consumer Advocate on any applicable grounds.

CONCLUSION

WHEREFORE, Piedmont, reserving its rights as described above, hereby provides notice to the Commission of its non-objection to the Consumer Advocate's Motion for Leave to Issue More Than Forty Discovery Requests.

Respectfully submitted, this the 21st day of August, 2020.

*Counsel for Piedmont Natural Gas Company,
Inc.:*

/s/ Paul S. Davidson

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Certificate of Service

I hereby certify that a true and exact copy of the foregoing has been sent via email, and first class U.S. Mail, to the following:

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this 21st day of August, 2020.

s/ Paul S. Davidson

Paul S. Davidson