

STATE OF TENNESSEE

Office of the Attorney General



**HERBERT H. SLATERY III**  
ATTORNEY GENERAL AND REPORTER

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January 10, 2022

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. (Docket Nos. 21-00073, 21-00101, and 21-00102)

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 some specific records which the Consumer Advocate believes TPUC may possess that are needed for the Consumer Advocate's analysis in the above-referenced Dockets. The records requested are as follows:

1. Please provide all quarterly submissions made by Piedmont Natural Gas Company, Inc. (Piedmont) related to its Purchased Gas Adjustment ("PGA") and Actual Cost Adjustment ("ACA") in 2020 and 2021. Additionally, please provide any information requests issued by TPUC Staff regarding these quarterly submissions, along with the responses to such requests by Piedmont.
2. Piedmont's current tariff, Seventy-Fourth Revised Sheet No. 1 (attached) states that the Billing Rates are effective November 1, 2021. Please provide Piedmont's filing with TPUC giving notice of the revised tariff sheet; Piedmont's documentation supporting such revisions; all informational exchanges between TPUC Staff and TPUC regarding the revisions; and TPUC's approval of the revisions.

3. Please provide the PGA filed by Piedmont on January 29, 2020, in TPUC Docket No. 20-00107.<sup>1</sup> Also, under TPUC Rule 1220-04-07-.03(1)(a)(ii) and by Piedmont's Tariff, Tennessee Service Schedule No. 311, § III.A.4., Third Revised Page 5 of 8, please provide:
  - a. The "exhibit showing the computation of the Gas Charge Adjustment a PGA tariff sheet, and applicable revised tariff sheets issued by suppliers;" and
  - b. The "transmittal letter [stating] the PGA tariff sheet number, the service area(s), the primary reasons for the revision."
4. On August 31, 2021, Piedmont filed its ACA Filing for the Period July 1, 2020, through June 30, 2021, in TPUC Docket No. 21-00107. TPUC Staff have not yet filed a Compliance Audit Report in this docket. Please provide the PGA filing by Piedmont, which is part of the review by TPUC Staff. Also, under TPUC Rule 1220-04-07-.03(1)(a)(ii) and by Piedmont's Tariff, Tennessee Service Schedule No. 311, § III.A.4., Third Revised Page 5 of 8, please provide:
  - a. The "exhibit showing the computation of the Gas Charge Adjustment a PGA tariff sheet, and applicable revised tariff sheets issued by suppliers;" and
  - b. The "transmittal letter [stating] the PGA tariff sheet number, the service area(s), the primary reasons for the revision."
5. Please provide Piedmont's annual PGA filings in (i) 2021 and (ii) 2022. Additionally, please provide any information requests issued by TPUC Staff regarding these quarterly submissions, along with the responses to such requests by Piedmont.

If any of the requested documents are identified as Confidential, the Consumer Advocate requests a meeting with the General Counsel's Office to discuss a path for the Consumer Advocate to gain access to such Confidential documents.

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  
Senior Assistant Attorney General

cc: Pia Powers  
James Jeffries IV  
Paul S. Davidson

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<sup>1</sup> Compliance Audit Report by the Utilities Division, p. 3, TPUC Docket No. 20-00107 (March 19, 2021).

PIEDMONT NATURAL GAS COMPANY, INC.  
Tennessee Service Territory  
Billing Rates Effective: November 1, 2021

Rate Schedule	Description	Tariff Base Rate Docket No. 20-00086 <1>	Temporary Decrements Approved in Docket No.18-00040								Rate Case Rider	Total Adj. Factor (Sum Col.2 thru Col.9)	Billing Rate <sup>1</sup> (Col.1+Col.10)
			Cumulative PGA		Current ACA		Current IPA	Current IM Adjustment	Deferred Base Revenue Refund	Unprotected Excess ADIT Refund			
			Demand	Commodity	Demand	Commodity							
			<2>	<3>	<4>	<4b>							
Residential 301	Monthly Charge-Nov.-Mar.	\$17.45											\$17.45
	Monthly Charge-Apr.-Oct.	\$13.45											\$13.45
	Nov.- Mar. per TH	0.53886	0.07577	0.48126	0.00310	0.06736	0.00748	0.00000	(0.01958)	(0.04211)	0.00000	0.57328	1.11214
	Apr.- Oct. per TH	0.44598	0.07577	0.48126	0.00310	0.06736	0.00748	0.00000	(0.01958)	(0.04211)	0.00000	0.57328	1.01926
Small General 302	Monthly Charge	\$44.00											\$44.00
	Nov.- Mar. per TH	0.55659	0.07577	0.48126	0.00310	0.06736	0.00748	0.00000	(0.01710)	(0.03678)	0.00000	0.58109	1.13768
	Apr.- Oct. per TH	0.46492	0.07577	0.48126	0.00310	0.06736	0.00748	0.00000	(0.01710)	(0.03678)	0.00000	0.58109	1.04601
Medium General 352	Monthly Charge	\$225.00											\$225.00
	Nov.- Mar. per TH	0.48645	0.07577	0.48126	0.00310	0.06736	0.00748	0.00000	(0.01710)	(0.03678)	0.00000	0.58109	1.06754
	Apr.- Oct. per TH	0.40633	0.07577	0.48126	0.00310	0.06736	0.00748	0.00000	(0.01710)	(0.03678)	0.00000	0.58109	0.98742
Motor Vehicle Fuel 343	Monthly Charge	varies by customer per their corresponding rate schedule											
	Nov.- Mar. per TH	varies by customer per their corresponding rate schedule											
	Apr.- Oct. per TH	varies by customer per their corresponding rate schedule											
303 Firm General Sales	Monthly Charge	\$800.00											\$800.00
	Demand Charge per TH	0.80000	0.82829		0.03334							0.86163	1.66163
	First 15,000 TH/TH	0.18700		0.48126		0.06736	0.00748	0.00000	(0.00319)	(0.00685)	0.00000	0.54606	0.73306
	Next 25,000 TH/TH	0.16800		0.48126		0.06736	0.00748	0.00000	(0.00319)	(0.00685)	0.00000	0.54606	0.71406
	Next 50,000 TH/TH	0.14000		0.48126		0.06736	0.00748	0.00000	(0.00319)	(0.00685)	0.00000	0.54606	0.68606
	Over 90,000 TH/TH	0.08000		0.48126		0.06736	0.00748	0.00000	(0.00319)	(0.00685)	0.00000	0.54606	0.62606
304 Interruptible General Sales	Monthly Charge	\$800.00											\$800.00
	First 15,000 TH/TH	0.13500		0.48126		0.06736	0.00748	0.00000	(0.00319)	(0.00685)	0.00000	0.54606	0.68106
	Next 25,000 TH/TH	0.11050		0.48126		0.06736	0.00748	0.00000	(0.00319)	(0.00685)	0.00000	0.54606	0.65656
	Next 50,000 TH/TH	0.09100		0.48126		0.06736	0.00748	0.00000	(0.00319)	(0.00685)	0.00000	0.54606	0.63706
	Over 90,000 TH/TH	0.04035		0.48126		0.06736	0.00748	0.00000	(0.00319)	(0.00685)	0.00000	0.54606	0.58641
313 Firm Transportation	Monthly Charge	\$800.00											\$800.00
	Demand Charge per TH	0.80000	0.82829		0.03334							0.86163	1.66163
	First 15,000 TH/TH	0.18700						0.00000	(0.00319)	(0.00685)	0.00000	(0.01004)	0.17696
	Next 25,000 TH/TH	0.16800						0.00000	(0.00319)	(0.00685)	0.00000	(0.01004)	0.15796
	Next 50,000 TH/TH	0.14000						0.00000	(0.00319)	(0.00685)	0.00000	(0.01004)	0.12996
	Over 90,000 TH/TH	0.08000						0.00000	(0.00319)	(0.00685)	0.00000	(0.01004)	0.06996
314 Interruptible Transportation	Monthly Charge	\$800.00											\$800.00
	First 15,000 TH/TH	0.13500						0.00000	(0.00319)	(0.00685)	0.00000	(0.01004)	0.12496
	Next 25,000 TH/TH	0.11050						0.00000	(0.00319)	(0.00685)	0.00000	(0.01004)	0.10046
	Next 50,000 TH/TH	0.09100						0.00000	(0.00319)	(0.00685)	0.00000	(0.01004)	0.08096
	Over 90,000 TH/TH	0.04035						0.00000	(0.00319)	(0.00685)	0.00000	(0.01004)	0.03031
310 Resale Service	Demand Charge per TH	0.80000	0.82829		0.03334							0.86163	1.66163
	Commodity Charge	0.49063		0.48126		0.06736	0.00748	0.00000	(0.00970)	(0.02086)	0.00000	0.52554	1.01617

## NOTES:

1/ In accordance with the Tennessee Public Service Commission order in Docket U-7074 customers metered inside Davidson County are required to pay an additional 6.49% for collection of the Metro Franchise Fee. Customers served by the Ashland City, Fairview, Franklin, Greenbrier, Hartsville, Mt. Juliet and White House systems are required to pay 5.0%. Customers served by the Nolensville system are required to pay 3%.