

STATE OF TENNESSEE

Office of the Attorney General



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March 9, 2022

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

Re: Clarification of Records Request Related to Piedmont Natural Gas  
Company, Inc. (TPUC Docket Nos. 21-00073, 21-00101, and 21-00102)

Dear Ms. Cashman-Grams:

This letter is in response to your correspondence dated March 8, 2022. In this correspondence, you requested a more specific request to our Question 1 regarding quarterly submissions from Piedmont. For ease of reading, Question 1 is 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.

Regarding the ACA, the Consumer Advocate is requesting the quarterly reports referenced in the Commission's *Order Adopting ACA Audit Report of Tennessee Public Utility Commission's Utilities Division*.<sup>1</sup> Specifically, the Commission directed Piedmont to "informally file, on a quarterly basis, its Actual Cost Adjustment Account balances with the Tennessee Public Utility Commission Staff."<sup>2</sup>

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<sup>1</sup> *Order Adopting ACA Audit Report of Tennessee Public Utility Commission's Utilities Division*, TPUC Docket No. 20-00107 (May 6, 2021).

<sup>2</sup> *Id.* at p. 2, Item 2.

Regarding the IPA, the Consumer Advocate is requesting the quarterly reports referenced in the Commission's Utilities Division's *Piedmont Natural Gas Company's Incentive Plan Account*, which was approved by the Commission.<sup>3</sup> Specifically, Piedmont's Service Schedule No. 316 states "[t]he Company will file calculations of shared savings and shared costs quarterly with the Authority not later than 60 days after the end of each interim fiscal quarter and will file an annual report not later than 60 days following the end of each Plan Year."<sup>4</sup>

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>3</sup> *Order Adopting Compliance Audit Report of the Tennessee Public Utility Commission's Utilities Division*, Exhibit A, Attachment 1, p. 5, TPUC Docket No. 20-00106 (May 6, 2021).

<sup>4</sup> *Id.*