Electronically Filed in TPUC Docket Room on November 30, 2021 at 1:59 p.m.



Waller Lansden Dortch & Davis, LLP 511 Union Street, Suite 2700 P.O. Box 198966 Nashville, TN 37219-8966

615.244.6380 main 615.244.6804 fax wallerlaw.com

Paul S. Davidson 615.850.8942 direct paul.davidson@wallerlaw.com

November 30, 2021

Via Email and First Class U.S. Mail

Executive Director Earl Taylor c/o Ectory Lawless Tennessee Public Utility Commission 502 Deaderick Street, Fourth Floor Nashville, Tennessee 37243

Re: Petition of Piedmont Natural Gas Company for Approval of an Integrity

Management Rider to its Approved Rate Schedules and Service Regulations

Ε

Docket No. 21-<u>0014</u>1

Dear Mr. Taylor:

Enclosed please find an original and five (5) copies of Piedmont Natural Gas Company Inc.'s ("Piedmont" or "Company") Integrity Management Rider ("IMR" or "Rider") mechanism annual filing pursuant to this Rider.

Piedmont's IMR mechanism, Service Schedule No. 317 as approved by the Tennessee Regulatory Authority Order on May 13, 2014, requires that Piedmont submit an annual filing no later than November 30th of each year.

Piedmont hereby submits its 2021 annual filing which includes the following information in accordance with Service Schedule No. 317: (a) the monthly IMR filing for October 2021, (b) a schedule of all journal entries made related to this Rider for the previous 12 months, (c) billing determinants for the prior 12 months as used in the computation of the Deferred Account Adjustment, (d) capitalization policy effective for the prior 12 months, (e) the computation calculating the IMRR and all supporting schedules, (f) a schedule of any proposed prior period adjustments, and (g) a statement of whether the Company is aware of any changing conditions that may affect whether the rider is still in the public interest, including the identification of those factors.

Also included with this filing is the Direct Testimony of Pia K. Powers in support of Piedmont's 2021 annual filing.

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 a "filed" stamped copy of the same via my assistant's email, at denise.guye@wallerlaw.com.

Very truly yours,

Paul S. Davidson

Enclosures

cc: Consumer Advocate

Bruce Barkley Pia Powers

James H. Jeffries IV

Before the Tennessee Public Utility Commission

Docket No. 21- <u>00141</u>

Petition of Piedmont Natural Gas Company, Inc. for Approval of an Integrity Management Rider to its Approved Rate Schedules and Service Regulations

Integrity Management Rider

2021 Annual Filing



TPUC Docket No. 21-<u>00141</u>
Integrity Management Rider
October 2021 Monthly Report

Piedmont Natural Gas Company, Inc.
Integrity Management Rider
State of Tennessee
TPUC Docket No. 21

Cumulative Integrity Management Investment Amount

Actual Integrity Management Investment, by Integrity Project Type

		Current Year: CY 2021						
Line No.			October 2021 Capital Expenditure ¹		rior Cumulative pital Expenditure ²		Cumulative pital Expenditure of October 2021	
1	TN Direct Corrosion Control	Ś	22,586.78	Ś	250,609.15	Ś	273,195.93	
2	Casing Remediation	\$	362,618.83	\$	967,959.55	\$	1,330,578.38	
3	Distribution Integrity	\$	2,241,909.28	, \$	25,398,918.19	\$	27,640,827.47	
4	Transmission Integrity	\$	939,177.81	\$	4,919,438.87	\$	5,858,616.68	
5	Total	\$	3,566,292.70	\$	31,536,925.76	\$	35,103,218.46	
	Joint Property: CO3-State							
6	OASIS Project (Work & Asset Management System)	\$	-	\$	-	\$	-	
7	TN % of CO-3 for Current Month ³		16.19%					
8	Total Allocated to TN	\$	-	\$	-	\$	-	
9	Total Capital Expenditures [Line 5 + Line 8]	\$	3,566,292.70	\$	31,536,925.76	\$	35,103,218.46	
10	Less: Amount Included in the Attrition Period	\$	3,566,292.70	\$	31,536,925.76	\$	35,103,218.46	
11	Total Integrity Management Investment	\$	-	\$	-	\$	-	

^{1/} Represents, for the current month, the actual Integrity Management Investment that is subject to this Rider

^{2/} Represents, as of the prior month, the cumulative Integrity Management Investment for the current calendar year that is subject to this rider. The CY 2021 cumulative amount is shown to aid comparison to the Attrition Period amount in Docket No. 20-00086. The Attrition Period in Docket No. 20-00086 covered the 12-month period ended 12/31/2021. The amount of TIMP-Transmission Integrity, DIMP-Distribution Integrity, CSNG-Casing & Remediation and CORR-Corrosion Control capital investment included in the Total Attrition Period for that proceeding was \$34,521,347.

^{3/} Represents the TN% of Total Company Gas Plant Excluding Joint Property, which is updated annually

Detail of Current Month's Integrity Management Investment Amount Actual Capital Investment for Current Month, by Capital Funding Project

Line No.	Capital Project Type	Funding Project Number	District	Funding Project Description	October 2021
1	CORR-Corrosion Control	F0228798	17	Hillsboro Rd. Rectifier&Ground Bed	589.56
2	CORR-Corrosion Control	F0229704	17	Nashville Rectifier & Ground Bed	1,632.09
3	CORR-Corrosion Control	F0232417	17	Dickerson Pike New Rectifier & Grou	3,487.85
4	CORR-Corrosion Control	F0232418	17	Line 310 Corrosion Remediation	16,870.32
5	CORR-Corrosion Control	F0232419	17	Line 202 Corrosion Remediation	6.96
6	CSNG-Casing & Remediation	FP1734404	17	Casing #2670 Old Hickory Blvd - Pip	362,618.83
7	DIMP-Distribution Integrity	F0224331	17	Paragon Mills Road	472,357.36
8	DIMP-Distribution Integrity	F0225698	17	Centennial Blvd Main Replacement	4,898.56
9	DIMP-Distribution Integrity	F0229092	17	39th Ave North	(39.25)
10	DIMP-Distribution Integrity	F0230667	17	Pennington Bend Station Relocation	993,440.89
11	DIMP-Distribution Integrity	F0230670	17	MAIN CONSTRUCTION CHARTER PROJECTS	(9,801.68)
12	DIMP-Distribution Integrity	F0231383	17	28th Ave N	26,645.81
13	DIMP-Distribution Integrity	F0232423	17	44th Ave N at Tennessee Ave - Pipe	23,882.45
14	DIMP-Distribution Integrity	F0232425	17	MAIN CONSTRUCTION CHARTER PROJECTS	36,133.05
15	DIMP-Distribution Integrity	F0232430	17	255 Cherokee Road Main Replacement	54,295.16
16	DIMP-Distribution Integrity	F0232432	17	Trinity to Cowan St Main Replacemen	26,821.13
17	DIMP-Distribution Integrity	F0233985	17	MAIN CONSTRUCTION CHARTER PROJECTS	9,643.01
18	DIMP-Distribution Integrity	F0234594	17	MAIN CONSTRUCTION CHARTER PROJECTS	1,973.56
19	DIMP-Distribution Integrity	F0234595	17	MAIN CONSTRUCTION CHARTER PROJECTS	20,456.73
20	DIMP-Distribution Integrity	FP1734429	17	MAIN CONSTRUCTION CHARTER PROJECTS	367,024.61
21	DIMP-Distribution Integrity	FP1734726	17	Cowan St HP Distribution Pipeline	214,177.89
22	TIMP-Transmission Integrity	F0230600	17	Line 301-Valve Automation-Facil	627,237.74
23	TIMP-Transmission Integrity	F0232503	17	Line 203 MAOP Reconfirmation - Pipe	700.46
24	TIMP-Transmission Integrity	F0234671	17	Emergent Lines 383-384 ILI Retrofit	9,067.05
25	TIMP-Transmission Integrity	FP1734120	17	Line 431 Replacement	144.15
26	TIMP-Transmission Integrity	FP1734142	17	Line 308 Replacement	300,999.96
27	TIMP-Transmission Integrity	FP1734394	17	Line 431 Ph II Land	1,028.45

28	Total (unallocated)	\$	3,566,292.70
	subtotal: TN Direct (unallocated) subtotal: CO-3 (unallocated)	\$ \$	3,566,292.70 -
		\$	3,566,292.70

IMR Monthly Report for October 2021 Schedule 3

<u>Schedule Detailing the Integrity Management Deferred Account Adjustment Recorded for the Month</u> Calculation of the IM Deferred Account Balance Amount Due From (To) Customers per GL Account No. 0253139

Line No.	<u>-</u>		Oct-21
1	Beginning Balance	Prior Month's IMR Report	\$ 18,867.39
2	IMR Revenue Recognition	Prior Annual IMR Report	-
3	(Collections from IM Adjustment)	see Separate Schedule	-
4	Ending Balance Before Interest	sum Lines 1 thru 3	18,867.39
5	Average Balance	(Line 1 + Line 4) /2	18,867.39
6	Accrued Interest	Line 5 * Line 9	51.09
7	Ending Balance After Interest	Line 4 + Line 6	\$ 18,918.48
8	Applicable Annual Interest Rate	same as for ACA	0.032500
9	Monthly Interest Rate	Line 8 / 12	0.002708
10	Actual GL #0253139 EOM Balance	per GL	\$ 18,918.48
11	Variance	Line 7 - Line 10	\$ 0.00
Journal E	intry: To Record Revenue		
	47136 0253139 GA489 PTOP		-
	47136 0480000 GA489 PTOP 0526 RESVAL		-
	47136 0481200 GA489 PTOP 0526 COMSTD		-
	47136 0481000 GA489 PTOP 0526 INDSLS		-
	47136 0483011 GA489 PTOP 0526 GASRSL		-
	47136 0489000 GA489 PTOP 0526 BOTHRV		-
Journal E	intry: To Record Interest		
	47136 0253139 GA626 PTOP		51.09
	47136 0431150 GA626 PTOP 0526		(51.09)

General Ledger Support

Integrity Management Deferred Account Adjustment Recorded for the Month

Calculation of the IM Adjustment Collections:

		Oct-21					
		IM Adjustment	Adjustment Usage			Collections	
		(\$ per therm)	х	(therms)	=	(\$)	
Line No.	<u>-</u>						
1	Residential (301)	0.00000		2,618,993		-	
2	Small General Sales (302)	0.00000		2,264,136		-	
3	Medium General Sales (352)	0.00000		761,962		-	
4	Experimental Motor Vehicle Fuel (343/302/352)	0.00000		1,222		-	
5	Firm Lg General Sales (303)	0.00000		495,275		-	
6	Experimental Motor Vehicle Fuel (343/303)	0.00000		26,796		-	
7	Firm Lg General Transportation (313)	0.00000		1,307,809		-	
8	Experimental Motor Vehicle Fuel (343/313)	0.00000		144,133		-	
9	Firm Resale (310)	0.00000		-		-	
10	Interruptible Lg General Sales (304)	0.00000		19,114		-	
11	Interruptible Lg General Transportation (314)	0.00000		7,129,901		-	
12	Total				\$	-	

Journal Entry: To Record Collections

47136 0480000 GA489 PTOP 0526 RESVAL
47136 0481200 GA489 PTOP 0526 COMSTD
47136 0481200 GA489 PTOP 0526 COMSTD
47136 0481000 GA489 PTOP 0526 INDSLS
47136 0489000 GA489 PTOP 0526 BOTHRV
47136 0483011 GA489 PTOP 0526 GASRSL
47136 0481000 GA489 PTOP 0526 INDSLS
47136 0481000 GA489 PTOP 0526 INDSLS
47136 0481000 GA489 PTOP 0526 INDSLS
47136 0489000 GA489 PTOP 0526 BOTHRV
47136 0253139 GA489 PTOP

-

TPUC Docket No. 21-<u>0014</u>1 Integrity Management Rider 2021 Annual Report

Schedule of Journal Entries Related to the Integrity Management Rider for the Previous Twelve Months (November 2020 thru October 2021)
General Ledger Support: Integrity Management Deferred Account Adjustment

Calculation of the IM Deferred Account Balance By Month

Amount Due From (To) Customers per GL Account No. 0253139

Line No.	-		<u>Nov-20</u>	<u>Dec-20</u>	<u>Jan-21</u>	Feb-21	<u>Mar-21</u>	Apr-21	May-21	<u>Jun-21</u>	<u>Jul-21</u>	Aug-21	<u>Sep-21</u>	Oct-21
1	Beginning Balance	Prior Month's IMR Report	\$ (6,901,877.03)	\$ (5,881,469.26)	\$ (5,149,446.54)	\$ (3,654,644.69)	\$ (2,173,996.04) \$	(984,243.97) \$	(363,164.19) \$	18,664.40 \$	18,714.94 \$	18,765.62 \$	18,816.44 \$	18,867.39
2	IMR Revenue Recognition	Prior Annual IMR Report	2,444,115.31	3,891,002.18	-	- 1	-	-	-	-	-	-	-	-
3	(Collections from IM Adjustment)	see Separate Schedule	(1,406,422.29)	(3,144,063.80)	1,506,706.47	1,488,529.96	1,194,022.54	622,901.70	382,294.41	-	-	-	-	-
4	Ending Balance Before Interest	sum Lines 1 thru 3	(5,864,184.01)	(5,134,530.88)	(3,642,740.07)	(2,166,114.73)	(979,973.50)	(361,342.27)	19,130.22	18,664.40	18,714.94	18,765.62	18,816.44	18,867.39
5	Average Balance	(Line 1 + Line 4) /2	(6,383,030.52)	(5,508,000.07)	(4,396,093.31)	(2,910,379.71)	(1,576,984.77)	(672,793.12)	(172,016.98)	18,664.40	18,714.94	18,765.62	18,816.44	18,867.39
6	Accrued Interest	Line 5 * Line 9	(17,285.25)	(14,915.66)	(11,904.62)	(7,881.31)	(4,270.47)	(1,821.92)	(465.82)	50.54	50.68	50.82	50.95	51.09
7	Ending Balance After Interest	Line 4 + Line 6	\$ (5,881,469.26)	\$ (5,149,446.54)	\$ (3,654,644.69)	\$ (2,173,996.04)	\$ (984,243.97) \$	(363,164.19) \$	18,664.40 \$	18,714.94 \$	18,765.62 \$	18,816.44 \$	18,867.39 \$	18,918.48
8	Applicable Annual Interest Rate	same as for ACA	0.032500	0.032500	0.032500	0.032500	0.032500	0.032500	0.032500	0.032500	0.032500	0.032500	0.032500	0.032500
9	Monthly Interest Rate	Line 8 / 12	0.002708	0.002708	0.002708	0.002708	0.002708	0.002708	0.002708	0.002708	0.002708	0.002708	0.002708	0.002708
10	Actual GL #0253139 EOM Balance	per GL	\$ (5,881,469.26)	\$ (5.149.446.54)	\$ (3.654.644.69)	\$ (2.173.996.04)	\$ (984,243.97) \$	(363,164.19) \$	18,664.40 \$	18,714.94 \$	18,765.62 \$	18,816.44 \$	18,867.39 \$	18,918.48
11	Variance	Line 7 - Line 10	0	0	0	0	0	0	0	0	0	0	0	0
Journal Er	ntry: To Record Revenue													
	47136 0253139 GA489 PTOP		2,444,115.31	3,891,002.18	-	-	-	-	-	-	-	-	-	-
	47136 0480000 GA489 PTOP 0526 RESVAL		(1,457,768.14)	(2,320,749.34)	-	-	-	-	-	-	-	-	-	-
	47136 0481200 GA489 PTOP 0526 COMSTD		(762,563.98)	(1,213,992.68)	-	-	-	-	-	-	-	-	-	-
	47136 0481000 GA489 PTOP 0526 INDSLS		(32,971.11)	(52,489.62)	-	-	-	-	-	-	-	-	-	-
	47136 0483011 GA489 PTOP 0526 GASRSL		(684.35)	(1,089.48)	-	-	-	-	-	-	-	-	-	-
	47136 0489000 GA489 PTOP 0526 BOTHRV		(190,127.73)	(302,681.06)	-	-	-	-	-	-	-	-	-	-
Journal Er	ntry: To Record Interest													
	47136 0253139 GA626 PTOP		(17,285.25)	(14,915.66)	(11,904.62)	(7,881.31)	(4,270.47)	(1,821.92)	(465.82)	50.54	50.68	50.82	50.95	(19,337.99)
	47136 0431150 GA626 PTOP 0526		17,285.25	14,915.66	11,904.62	7,881.31	4,270.47	1,821.92	465.82	(50.54)	(50.68)	(50.82)	(50.95)	19,337.99

2021 IMR Annual Report Schedule 2 Page 1 of 12

Schedule of Journal Entries Related to the Integrity Management Rider for the Previous Twelve Months (November 2020 thru October 2021) General Ledger Support: Integrity Management Deferred Account Adjustment

Billing Determinants & Collections from the Integrity Management Adjustment By Month

		October 2021					
		IM Adjustment		Usage		Collections	
		(\$ per therm)	Х	(therms)	=	(\$)	
Line No.							
1	Residential (301)	0.00000		-		-	
2	Small General Sales (302)	0.00000		-		-	
3	Medium General Sales (352)	0.00000		-		-	
4	Experimental Motor Vehicle Fuel (343/302/352)	0.00000		-		-	
5	Firm Lg General Sales (303)	0.00000		-		-	
6	Experimental Motor Vehicle Fuel (343/303)	0.00000		-		-	
7	Firm Lg General Transportation (313)	0.00000		-		-	
8	Experimental Motor Vehicle Fuel (343/313)	0.00000		-		-	
9	Firm Resale (310)	0.00000		-		-	
10	Interruptible Lg General Sales (304)	0.00000		-		-	
11	Interruptible Lg General Transportation (314)	0.00000		-		-	
12	Total				-	\$ -	

าร

Journal Lifely. To Record Collections	
47136 0480000 GA489 PTOP 0526 RESVAL	-
47136 0481200 GA489 PTOP 0526 COMSTD	-
47136 0481200 GA489 PTOP 0526 COMSTD	-
47136 0481000 GA489 PTOP 0526 INDSLS	-
47136 0489000 GA489 PTOP 0526 BOTHRV	-
47136 0483011 GA489 PTOP 0526 GASRSL	-
47136 0481000 GA489 PTOP 0526 INDSLS	-
47136 0489000 GA489 PTOP 0526 BOTHRV	-
47136 0253139 GA489 PTOP	-

Journal Entry: To Record Collections

Schedule of Journal Entries Related to the Integrity Management Rider for the Previous Twelve Months (November 2020 thru October 2021)

General Ledger Support: Integrity Management Deferred Account Adjustment

Billing Determinants & Collections from the Integrity Management Adjustment By Month

			September 2021					
		IM Adjustment		Usage		Collections		
		(\$ per therm)	х	(therms)	=	(\$)		
Line No.								
1	Residential (301)	0.00000		2,254,066		-		
2	Small General Sales (302)	0.00000		2,058,395		-		
3	Medium General Sales (352)	0.00000		677,369		-		
4	Experimental Motor Vehicle Fuel (343/302/352)	0.00000		3,250		-		
5	Firm Lg General Sales (303)	0.00000		392,084		-		
6	Experimental Motor Vehicle Fuel (343/303)	0.00000		26,899		-		
7	Firm Lg General Transportation (313)	0.00000		1,200,169		-		
8	Experimental Motor Vehicle Fuel (343/313)	0.00000		143,633		-		
9	Firm Resale (310)	0.00000		-		-		
10	Interruptible Lg General Sales (304)	0.00000		10,562		-		
11	Interruptible Lg General Transportation (314)	0.00000		6,822,003		-		
12	Total				-	\$ -		

47136 0480000 GA489 PTOP 0526 RESVAL	-
47136 0481200 GA489 PTOP 0526 COMSTD	-
47136 0481200 GA489 PTOP 0526 COMSTD	-
47136 0481000 GA489 PTOP 0526 INDSLS	-
47136 0489000 GA489 PTOP 0526 BOTHRV	-
47136 0483011 GA489 PTOP 0526 GASRSL	-
47136 0481000 GA489 PTOP 0526 INDSLS	_

47136 0489000 GA489 PTOP 0526 BOTHRV 47136 0253139 GA489 PTOP

Schedule of Journal Entries Related to the Integrity Management Rider for the Previous Twelve Months (November 2020 thru October 2021)

General Ledger Support: Integrity Management Deferred Account Adjustment

Billing Determinants & Collections from the Integrity Management Adjustment By Month

				August 2021		
		IM Adjustment		Usage		Collections
		(\$ per therm)	Х	(therms)	=	(\$)
ine No.	<u>-</u>					
1	Residential (301)	0.00000		1,998,637		-
2	Small General Sales (302)	0.00000		1,975,331		-
3	Medium General Sales (352)	0.00000		635,588		-
4	Experimental Motor Vehicle Fuel (343/302/352)	0.00000		4,251		-
5	Firm Lg General Sales (303)	0.00000		376,380		-
6	Experimental Motor Vehicle Fuel (343/303)	0.00000		25,894		-
7	Firm Lg General Transportation (313)	0.00000		1,019,265		-
8	Experimental Motor Vehicle Fuel (343/313)	0.00000		140,279		-
9	Firm Resale (310)	0.00000		-		-
10	Interruptible Lg General Sales (304)	0.00000		14,127		-
11	Interruptible Lg General Transportation (314)	0.00000		6,720,977		-
12	Total				=	\$ -

Journal Entry: To Record Collections	
47136 0480000 GA489 PTOP 0526 RESVAL	-
47136 0481200 GA489 PTOP 0526 COMSTD	-
47136 0481200 GA489 PTOP 0526 COMSTD	-
47136 0481000 GA489 PTOP 0526 INDSLS	-
47136 0489000 GA489 PTOP 0526 BOTHRV	-
47136 0483011 GA489 PTOP 0526 GASRSL	-
47136 0481000 GA489 PTOP 0526 INDSLS	-
47136 0489000 GA489 PTOP 0526 BOTHRV	-

47136 0253139 GA489 PTOP

Schedule of Journal Entries Related to the Integrity Management Rider for the Previous Twelve Months (November 2020 thru October 2021)

General Ledger Support: Integrity Management Deferred Account Adjustment

Billing Determinants & Collections from the Integrity Management Adjustment By Month

				July 2021		
		IM Adjustment		Usage		Collections
		(\$ per therm)	х	(therms)	=	(\$)
Line No.	_					
1	Residential (301)	0.00000		2,351,579		-
2	Small General Sales (302)	0.00000		2,105,958		-
3	Medium General Sales (352)	0.00000		644,788		-
4	Experimental Motor Vehicle Fuel (343/302/352)	0.00000		6,286		-
5	Firm Lg General Sales (303)	0.00000		366,368		-
6	Experimental Motor Vehicle Fuel (343/303)	0.00000		24,226		-
7	Firm Lg General Transportation (313)	0.00000		985,794		-
8	Experimental Motor Vehicle Fuel (343/313)	0.00000		136,114		-
9	Firm Resale (310)	0.00000		-		-
10	Interruptible Lg General Sales (304)	0.00000		7,417		-
11	Interruptible Lg General Transportation (314)	0.00000		6,542,088		-
12	Total				-	\$ -

Journal Entry: To Record Collections	
47136 0480000 GA489 PTOP 0526 RESVAL	-
47136 0481200 GA489 PTOP 0526 COMSTD	-
47136 0481200 GA489 PTOP 0526 COMSTD	-
47136 0481000 GA489 PTOP 0526 INDSLS	-
47136 0489000 GA489 PTOP 0526 BOTHRV	-
47136 0483011 GA489 PTOP 0526 GASRSL	-
47136 0481000 GA489 PTOP 0526 INDSLS	-
47136 0489000 GA489 PTOP 0526 BOTHRV	_

47136 0253139 GA489 PTOP

Schedule of Journal Entries Related to the Integrity Management Rider for the Previous Twelve Months (November 2020 thru October 2021)
General Ledger Support: Integrity Management Deferred Account Adjustment
Billing Determinants & Collections from the Integrity Management Adjustment By Month

				June 2021		
		IM Adjustment		Usage		Collections
		(\$ per therm)	х	(therms)	=	(\$)
Line No.						
1	Residential (301)	0.00000		3,156,843		-
2	Small General Sales (302)	0.00000		2,304,455		-
3	Medium General Sales (352)	0.00000		671,543		-
4	Experimental Motor Vehicle Fuel (343/302/352)	0.00000		5,792		-
5	Firm Lg General Sales (303)	0.00000		384,096		-
6	Experimental Motor Vehicle Fuel (343/303)	0.00000		18,711		-
7	Firm Lg General Transportation (313)	0.00000		1,053,084		-
8	Experimental Motor Vehicle Fuel (343/313)	0.00000		141,425		-
9	Firm Resale (310)	0.00000		-		-
10	Interruptible Lg General Sales (304)	0.00000		18,815		-
11	Interruptible Lg General Transportation (314)	0.00000		6,502,797		-
12	Total				-	\$ -

Journal Entry: To Record Collections
47136 0480000 GA489 PTOP 0526 RESVAL
47136 0481200 GA489 PTOP 0526 COMSTD

47136 0481200 GA489 PTOP 0526 COMSTD - 47136 0481200 GA489 PTOP 0526 COMSTD - 47136 0481000 GA489 PTOP 0526 INDSLS - 47136 0489000 GA489 PTOP 0526 BOTHRV - 47136 0483011 GA489 PTOP 0526 GASRSL - 47136 0481000 GA489 PTOP 0526 INDSLS - 47136 0489000 GA489 PTOP 0526 BOTHRV - 47136 0253139 GA489 PTOP 0526 BOTHRV - 5

Schedule of Journal Entries Related to the Integrity Management Rider for the Previous Twelve Months (November 2020 thru October 2021)

General Ledger Support: Integrity Management Deferred Account Adjustment

Billing Determinants & Collections from the Integrity Management Adjustment By Month

				May 2021		
		IM Adjustment		Usage		Collections
		(\$ per therm)	Х	(therms)	=	(\$)
Line No.						
1	Residential (301)	(0.03699)		5,464,189		(202,120.35)
2	Small General Sales (302)	(0.03231)		2,796,931		(90,368.84)
3	Medium General Sales (352)	(0.03231)		1,126,887		(36,409.71)
4	Experimental Motor Vehicle Fuel (343/352)	(0.03231)		2,340		(75.61)
5	Firm Lg General Sales (303)	(0.01435)		527,851		(7,574.66)
6	Experimental Motor Vehicle Fuel (343/303)	(0.01435)		17,149		(246.09)
7	Firm Lg General Transportation (313)	(0.01435)		1,253,257		(17,984.23)
8	Experimental Motor Vehicle Fuel (343/313)	(0.01435)		133,523		(1,916.06)
9	Firm Resale (310)	(0.01435)		-		-
10	Interruptible Lg General Sales (304)	(0.00359)		42,898		(154.00)
11	Interruptible Lg General Transportation (314)	(0.00359)		7,087,707		(25,444.86)
12	Total				_	\$ (382,294.41)

Journal Entry: 10 Heading Confederations	
47136 0480000 GA489 PTOP 0526 RESVAL	(202,120.35)
47136 0481200 GA489 PTOP 0526 COMSTD	(90,368.84)
47136 0481200 GA489 PTOP 0526 COMSTD	(36,485.32)
47136 0481000 GA489 PTOP 0526 INDSLS	(7,820.75)
47136 0489000 GA489 PTOP 0526 BOTHRV	(19,900.29)
47136 0483011 GA489 PTOP 0526 GASRSL	-
47136 0481000 GA489 PTOP 0526 INDSLS	(154.00)
47136 0489000 GA489 PTOP 0526 BOTHRV	(25,444.86)
47136 0253139 GA489 PTOP	382,294.41

Schedule of Journal Entries Related to the Integrity Management Rider for the Previous Twelve Months (November 2020 thru October 2021)

General Ledger Support: Integrity Management Deferred Account Adjustment

Billing Determinants & Collections from the Integrity Management Adjustment By Month

				April 2021		
		IM Adjustment		Usage		Collections
		(\$ per therm)	х	(therms)	=	(\$)
Line No.						
1	Residential (301)	(0.03699)		9,776,646		(361,638.14)
2	Small General Sales (302)	(0.03231)		4,387,456		(141,758.70)
3	Medium General Sales (352)	(0.03231)		1,716,991		(55,475.98)
4	Experimental Motor Vehicle Fuel (343/352)	(0.03231)		2,491		(80.48)
5	Firm Lg General Sales (303)	(0.01435)		910,876		(13,071.07)
6	Experimental Motor Vehicle Fuel (343/303)	(0.01435)		12,669		(181.80)
7	Firm Lg General Transportation (313)	(0.01435)		1,457,461		(20,914.56)
8	Experimental Motor Vehicle Fuel (343/313)	(0.01435)		144,496		(2,073.52)
9	Firm Resale (310)	(0.01435)		-		-
10	Interruptible Lg General Sales (304)	(0.00359)		46,149		(165.67)
11	Interruptible Lg General Transportation (314)	(0.00359)		7,671,804		(27,541.78)
12	Total				\$	(622,901.70)

47136 0480000 GA489 PTOP 0526 RESVAL	(361,638.14)
47136 0481200 GA489 PTOP 0526 COMSTD	(141,758.70)
47136 0481200 GA489 PTOP 0526 COMSTD	(55,556.46)
47136 0481000 GA489 PTOP 0526 INDSLS	(13,252.87)
47136 0489000 GA489 PTOP 0526 BOTHRV	(22,988.08)
47136 0483011 GA489 PTOP 0526 GASRSL	-
47136 0481000 GA489 PTOP 0526 INDSLS	(165.67)
47136 0489000 GA489 PTOP 0526 BOTHRV	(27,541.78)
47136 0253139 GA489 PTOP	622,901.70

Schedule of Journal Entries Related to the Integrity Management Rider for the Previous Twelve Months (November 2020 thru October 2021)

General Ledger Support: Integrity Management Deferred Account Adjustment

Billing Determinants & Collections from the Integrity Management Adjustment By Month

				March 2021		
		IM Adjustment		Usage		Collections
		(\$ per therm)	х	(therms)	=	(\$)
Line No.	<u>-</u>					
1	Residential (301)	(0.03699)		20,872,553		(772,075.74)
2	Small General Sales (302)	(0.03231)		8,095,579		(261,568.16)
3	Medium General Sales (352)	(0.03231)		2,863,645		(92,524.37)
4	Experimental Motor Vehicle Fuel (343/352)	(0.03231)		3,500		(113.09)
5	Firm Lg General Sales (303)	(0.01435)		719,975		(10,331.64)
6	Experimental Motor Vehicle Fuel (343/303)	(0.01435)		2,651		(38.04)
7	Firm Lg General Transportation (313)	(0.01435)		1,742,846		(25,009.84)
8	Experimental Motor Vehicle Fuel (343/313)	(0.01435)		151,812		(2,178.50)
9	Firm Resale (310)	(0.01435)		-		-
10	Interruptible Lg General Sales (304)	(0.00359)		22,017		(79.04)
11	Interruptible Lg General Transportation (314)	(0.00359)		8,385,551		(30,104.13)
12	Total					\$ (1,194,022.55)

47136 0480000 GA489 PTOP 0526 RESVAL	(772,075.74)
47136 0481200 GA489 PTOP 0526 COMSTD	(261,568.16)
47136 0481200 GA489 PTOP 0526 COMSTD	(92,637.46)
47136 0481000 GA489 PTOP 0526 INDSLS	(10,369.68)
47136 0489000 GA489 PTOP 0526 BOTHRV	(27,188.34)
47136 0483011 GA489 PTOP 0526 GASRSL	-
47136 0481000 GA489 PTOP 0526 INDSLS	(79.04)
47136 0489000 GA489 PTOP 0526 BOTHRV	(30,104.13)
47136 0253139 GA489 PTOP	1,194,022.55

Schedule of Journal Entries Related to the Integrity Management Rider for the Previous Twelve Months (November 2020 thru October 2021)

General Ledger Support: Integrity Management Deferred Account Adjustment

Billing Determinants & Collections from the Integrity Management Adjustment By Month

		February 2021				
		IM Adjustment		Usage		Collections
		(\$ per therm)	х	(therms)	=	(\$)
Line No.						
1	Residential (301)	(0.03699)		25,935,143		(959,340.94)
2	Small General Sales (302)	(0.03231)		10,195,780		(329,425.65)
3	Medium General Sales (352)	(0.03231)		3,626,092		(117,159.03)
4	Experimental Motor Vehicle Fuel (343/352)	(0.03231)		2,195		(70.92)
5	Firm Lg General Sales (303)	(0.01435)		1,146,889		(16,457.86)
6	Experimental Motor Vehicle Fuel (343/303)	(0.01435)		1,641		(23.55)
7	Firm Lg General Transportation (313)	(0.01435)		2,126,598		(30,516.69)
8	Experimental Motor Vehicle Fuel (343/313)	(0.01435)		106,573		(1,529.32)
9	Firm Resale (310)	(0.01435)		9,717		(139.44)
10	Interruptible Lg General Sales (304)	(0.00359)		27,206		(97.67)
11	Interruptible Lg General Transportation (314)	(0.00359)		9,406,376		(33,768.89)
12	Total					\$ (1,488,529.96)

1,488,529.96

Journal Entry: To Record Collections	
47136 0480000 GA489 PTOP 0526 RESVAL	(959,340.94)
47136 0481200 GA489 PTOP 0526 COMSTD	(329,425.65)
47136 0481200 GA489 PTOP 0526 COMSTD	(117,229.95)
47136 0481000 GA489 PTOP 0526 INDSLS	(16,481.41)
47136 0489000 GA489 PTOP 0526 BOTHRV	(32,046.01)
47136 0483011 GA489 PTOP 0526 GASRSL	(139.44)
47136 0481000 GA489 PTOP 0526 INDSLS	(97.67)
47136 0489000 GA489 PTOP 0526 BOTHRV	(33,768.89)

47136 0253139 GA489 PTOP

Schedule of Journal Entries Related to the Integrity Management Rider for the Previous Twelve Months (November 2020 thru October 2021)

General Ledger Support: Integrity Management Deferred Account Adjustment

Billing Determinants & Collections from the Integrity Management Adjustment By Month

		January 2021				
		IM Adjustment		Usage	•	Collections
		(\$ per therm)	х	(therms)	=	(\$)
Line No.						
1	Residential (301)	(0.03699)		26,602,043		(984,009.57)
2	Small General Sales (302)	(0.03231)		9,774,967		(315,829.18)
3	Medium General Sales (352)	(0.03231)		3,724,056		(120,324.25)
4	Experimental Motor Vehicle Fuel (343/352)	(0.03231)		2,965		(95.80)
5	Firm Lg General Sales (303)	(0.01435)		1,138,247		(16,333.84)
6	Experimental Motor Vehicle Fuel (343/303)	(0.01435)		3,271		(46.94)
7	Firm Lg General Transportation (313)	(0.01435)		2,186,795		(31,380.51)
8	Experimental Motor Vehicle Fuel (343/313)	(0.01435)		190,309		(2,730.93)
9	Firm Resale (310)	(0.01435)		10,719		(153.82)
10	Interruptible Lg General Sales (304)	(0.00359)		26,040		(93.48)
11	Interruptible Lg General Transportation (314)	(0.00359)		9,946,559		(35,708.15)
12	Total					\$ (1,506,706.47)

47136 0480000 GA489 PTOP 0526 RESVAL	(984,009.57)
47136 0481200 GA489 PTOP 0526 COMSTD	(315,829.18)
47136 0481200 GA489 PTOP 0526 COMSTD	(120,420.05)
47136 0481000 GA489 PTOP 0526 INDSLS	(16,380.78)
47136 0489000 GA489 PTOP 0526 BOTHRV	(34,111.44)
47136 0483011 GA489 PTOP 0526 GASRSL	(153.82)
47136 0481000 GA489 PTOP 0526 INDSLS	(93.48)
47136 0489000 GA489 PTOP 0526 BOTHRV	(35,708.15)
47136 0253139 GA489 PTOP	1,506,706.47

Schedule of Journal Entries Related to the Integrity Management Rider for the Previous Twelve Months (November 2020 thru October 2021)

General Ledger Support: Integrity Management Deferred Account Adjustment

Billing Determinants & Collections from the Integrity Management Adjustment By Month

			December 2020			
		IM Adjustment		Usage		Collections
		(\$ per therm)	Х	(therms)	=	(\$)
Line No.						
1	Residential (301)	0.11730		16,168,512		1,896,566.46
2	Small General Sales (302)	0.10247		6,891,441		706,165.96
3	Medium General Sales (352)	0.10247		2,634,651		269,972.69
4	Experimental Motor Vehicle Fuel (343/352)	0.10247		3,152		322.99
5	Firm Lg General Sales (303)	0.04551		1,067,412		48,577.92
6	Experimental Motor Vehicle Fuel (343/303)	0.04551		6,495		295.59
7	Firm Lg General Transportation (313)	0.04551		2,235,305		101,728.73
8	Experimental Motor Vehicle Fuel (343/313)	0.04551		116,055		5,281.66
9	Firm Resale (310)	0.04551		9,089		413.64
10	Interruptible Lg General Sales (304)	0.01138		30,787		350.36
11	Interruptible Lg General Transportation (314)	0.01138		10,051,653		114,387.81
12	Total				_	\$ 3,144,063.81

•	
47136 0480000 GA489 PTOP 0526 RESVAL	1,896,566.46
47136 0481200 GA489 PTOP 0526 COMSTD	706,165.96
47136 0481200 GA489 PTOP 0526 COMSTD	270,295.68
47136 0481000 GA489 PTOP 0526 INDSLS	48,873.51
47136 0489000 GA489 PTOP 0526 BOTHRV	107,010.39
47136 0483011 GA489 PTOP 0526 GASRSL	413.64
47136 0481000 GA489 PTOP 0526 INDSLS	350.36
47136 0489000 GA489 PTOP 0526 BOTHRV	114,387.81
47136 0253139 GA489 PTOP	(3,144,063.81)

Schedule of Journal Entries Related to the Integrity Management Rider for the Previous Twelve Months (November 2020 thru October 2021)

General Ledger Support: Integrity Management Deferred Account Adjustment

Billing Determinants & Collections from the Integrity Management Adjustment By Month

		November 2020				
		IM Adjustment		Usage		Collections
		(\$ per therm)	х	(therms)	=	(\$)
Line No.						
1	Residential (301)	0.11730		6,397,107		750,380.65
2	Small General Sales (302)	0.10247		3,010,261		308,461.44
3	Medium General Sales (352)	0.10247		1,344,655		137,786.80
4	Experimental Motor Vehicle Fuel (343/352)	0.10247		4,046		414.59
5	Firm Lg General Sales (303)	0.04551		663,462		30,194.16
6	Experimental Motor Vehicle Fuel (343/303)	0.04551		4,990		227.09
7	Firm Lg General Transportation (313)	0.04551		1,696,000		77,184.96
8	Experimental Motor Vehicle Fuel (343/313)	0.04551		106,961		4,867.80
9	Firm Resale (310)	0.04551		4,334		197.24
10	Interruptible Lg General Sales (304)	0.01138		31,874		362.73
11	Interruptible Lg General Transportation (314)	0.01138		8,466,155		96,344.84
12	Total				-	\$ 1,406,422.30

,	
47136 0480000 GA489 PTOP 0526 RESVAL	750,380.65
47136 0481200 GA489 PTOP 0526 COMSTD	308,461.44
47136 0481200 GA489 PTOP 0526 COMSTD	138,201.39
47136 0481000 GA489 PTOP 0526 INDSLS	30,421.25
47136 0489000 GA489 PTOP 0526 BOTHRV	82,052.76
47136 0483011 GA489 PTOP 0526 GASRSL	197.24
47136 0481000 GA489 PTOP 0526 INDSLS	362.73
47136 0489000 GA489 PTOP 0526 BOTHRV	96,344.84
47136 0253139 GA489 PTOP	(1,406,422.30)

Piedmont Natural Gas Company, Inc.
Integrity Management Rider
State of Tennessee
TPUC Docket No. 21

2021 IMR Annual Report

Schedule 3

Computation of the Integrity Management Adjustment

N/A

Piedmont Natural Gas Company, Inc.
Integrity Management Rider
State of Tennessee
TPUC Docket No. 21

Allocators from the Relevant Rate Case Order (Docket 20-00086)

N/A

Summary of IMRR Computation

Line		Rate Period Jan 1 2021 -	Rate Period Jan 1 2022 -
No.	Vintage Year	Dec 31 2021	Dec 31 2022
1	Vintage 1	n/a	n/a
2	Vintage 2	n/a	n/a
3	Vintage 3	n/a	n/a
4	Vintage 4	n/a	n/a
5	Vintage 5	n/a	n/a
6	Vintage 6	n/a	n/a
7	Vintage 7	n/a	n/a
8	Vintage 8	n/a	n/a
9	Total	n/a	n/a
10	Total IMRR, excluding IM Deferred Account Adjustment	<u>n/a</u>	n/a
	Spread of Total IMRR, excluding IM Deferred Adjustment, by Month		
11	January	n/a	n/a
12	February	n/a	n/a
13	March	n/a	n/a
14	April	n/a	n/a
15	May	n/a	n/a
16	June	n/a	n/a
17	July	n/a	n/a
18	August	n/a	n/a
19	September	n/a	n/a
20	October	n/a	n/a
21	November	n/a	n/a
22	December	n/a	n/a
23	Total	n/a	n/a

2021 IMR Annual Report Schedules 6 thru 14 Page 1 of 1

Piedmont Natural Gas Company, Inc. Integrity Management Rider State of Tennessee TPUC Docket No. 21-____

Annual Revenue Requirement Computation
Rider Rate Period: January 1, 2022 - December 31, 2022

N/A

Piedmont Natural Gas Company, Inc.
Integrity Management Rider
State of Tennessee
TPUC Docket No. 21

Schedule of Prior Period Adjustments

None

Piedmont Natural Gas Company, Inc.
Integrity Management Rider
State of Tennessee
TPUC Docket No. 21

Statement of Public Interest

Piedmont is not aware of any changes in the market conditions or other factors that affect whether this Rider is still in the public interest.

Piedmont Natural Gas Company, Inc.
Integrity Management Rider
State of Tennessee
TPUC Docket No. 21

See attached CONFIDENTIAL Duke Energy Regulated Electric & Gas Capitalization Guidelines dated 1/1/2021.

Piedmont Natural Ga	s Company, Inc.		
Integrity Manageme	nt Rider		
State of Tennessee			
TPUC Docket No. 21-			

2021 IMR Annual Report

Schedule 18

Pipeline Safety Metrics - Tennessee Service Territory

Response Time to Emergency Calls on Natural Gas Leaks / Odor

Average emergency response time for the period 11/1/2020 thru 10/31/2021 = 31.18 minutes

Age of Natural Gas Leaks

Average age of leaks for the period 11/1/2020 thru 10/31/2021 = 186.37 days

Number of Natural Gas Leaks by Grade

Number of leaks for the period 11/1/2020 thru 10/31/2021 by PHMSA category: Grade 1 = 339; Grade 2 = 283; Grade 3 = 1,490

Piedmont Natural Gas Company, Inc.
Integrity Management Rider
State of Tennessee
TPUC Docket No. 21-

Projected Integrity Management Rider Investment by Category

Capital Project Cost Information as reported to the Tennessee Public Utility Commission, Utilities Division Director by letter dated March 31, 2021

IMR Project Categories Transmission Integrity Distribution Integrity Casing and Remediation Corrosion Control		Projected FY2021		
		27,737,580 5,224,315 1,143,899 915,513		
Total	\$	35,021,306		

Piedmont Natural Gas Company, Inc.
Integrity Management Rider
State of Tennessee
TPUC Docket No. 21-

Projected Integrity Management Rider Investment by Project

Capital Project Cost Information as reported to the Tennessee Public Utility Commission, Utilities Division Director by letter dated March 31, 2021

Project Category	Funding Project Number	Project Name	FY2021	Description	Driver of Work/Necessity	Location (Area of Nashville)
Individual Capital Projects Over \$100,00	00		•			
Transmission Integrity	FP1734142	Line 469 Replacement	\$ 24,476,402	Installation of ~4.0 miles of 12" steel pipeline (design pressure: 1000 psig) at Line 310 to Lyndale Station to replace the existing Line 308 and convert existing line 308 to distribution main. Install launcher at Tucker Rd Junction and receiver at Lyndale Station.	Integrity Management Identified Risk	Bordeaux and North Nashville
Transmission Integrity	F0230600	Line 301 - Valve Automation		Retrofit two existing valves to be automated, install two new ROVs in accordance with Piedmont design standards. Line 301 and Line 203 currently have an MAOP of 735 psig. Retrofit 20" and 16" ball valves at Tennessee Gas Kinder Portland RS (4759)	Integrity Management Identified Risk	Joelton
Transmission Integrity	FP1734394	Line 431 Ph II & Rcls Dist Line 310	1,120,000	Piedmont Natural Gas (Piedmont) proposes to install a new 20" transmission pipeline (Line 431 Phase II) and 12" transmission lateral pipeline (Line 469) to functionally replace Piedmont Line 310 to support the Transmission Integrity Management Program (TIMP) as required by Federal Regulations. Line 310 will be reclassified from transmission to distribution operation after Line 431 Phase II is placed in-service. The project corridor begins at the intersection of new Line 431 Phase I to Line 310 in the Bordeaux neighborhood of Nashville, TN and will continue primarily in a dedicated easement to the Holts Holder pipeline interconnect station located in Whites Creek, TN	Integrity Management Identified Risk	Downtown
Casing & Remediation	FP1734404	Casing #2670 Old Hick Blvd@Lawing Rd	1,105,596	Drill 75' 8" transmission main abandon casing in place - Old Hickory Blvd @ Lawing Road	Integrity Management Identified Risk	Davidson County- Nashville, north of Downtown
Distribution Integrity	F0230662	28th Ave N	656,802	Installation of 8,300' - 2" MDPE along 28th Ave N, 26th Ave N, Merry St, 25th Ave N, Booker St, Batavia St, and Herman St. Retire 8300 2" 25#MAOP Stell	Integrity Management Identified Risk	Downtown
Corrosion Control	FP1708010	Nashville Anodes	499,958	To install anodes in the Nashville Resource Center as needed based on system needs.	Integrity Management Identified Risk	Various locations
Distribution Integrity	F0230667	Pennington Bend Station	281,214	Installation of 1,600 feet of 6" 300# MAOP steel along Music Valley Drive, east of Pennington Bend Road. Rebuild Pennington Bend Regulator Station. Retire 1,600 feet of 6" 125# MAOP steel (Laid in 1965).	Integrity Management Identified Risk	Nashville
Distribution Integrity	FP1734726	Cowan St HP Distribution Pipeline	248,689	Installation of approximately 2,200 feet 16" pipeline along Cowan St north of the Jefferson St intersection due to the city proposing a new major development called River North which impacted the routing of the future DIMP replacement of 12", 175# Distribution Main. This will be the first phase of the development.	Integrity Management Identified Risk	Downtown

Sub-total of Individual Capital Projects Over \$100,000

\$ 30,529,839

Remaining capital expenditures by category:

 Distribution Integrity
 4,037,610

 Casing & Remediation
 38,302

 Corrosion Control
 415,554

 Grand Total
 \$ 35,021,306