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April 28, 2022

Via Electronic Filing & 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.
Petition for Waiver of Periodic Meter Testing Under TPUC Rule 1220-04-05-.26(1)(e)
Docket No.: 22- 00038**

Dear Mr. Taylor:

Enclosed please find the Petition of Piedmont Natural Gas Company, Inc. ("Piedmont" or the "Company") for Waiver of Periodic Meter Testing Under TPUC Rule 1220-04-05-.26(1)(e). Also enclosed is a check for the filing fee in the amount of \$25.00.

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, denise.guye@wallerlaw.com.

Very truly yours,

A handwritten signature in blue ink that reads "Paul S. Davidson".

Paul S. Davidson

PSD:bms
Enclosures

cc: David Foster
Michelle Mairs
Bruce Barkley
Pia Powers
James Jeffries

**BEFORE THE TENNESSEE PUBLIC UTILITY COMMISSION
NASHVILLE, TENNESSEE**

IN RE:)
)
PETITION OF PIEDMONT NATURAL)
GAS COMPANY, INC. FOR WAIVER OF)
PERIODIC METER TESTING UNDER) Docket No. 22- 00038
TPUC RULE 1220-04-05-.26(e))
)
)

**PETITION OF PIEDMONT NATURAL GAS COMPANY, INC. FOR WAIVER OF
PERIODIC METER TESTING UNDER TPUC RULE 1220-04-05-.26(1)(e)**

Piedmont Natural Gas Company, Inc. (“Piedmont” or the “Company”) hereby requests that the Tennessee Public Utility Commission (“Commission” or “TPUC”) approve a waiver of the requirement that Piedmont complete its periodic meter testing obligations under TPUC Rule 1220-04-05-.26(1)(e) for the remainder of calendar year 2022. In support of this Petition, Piedmont respectfully shows unto the Commission as follows:

1. Piedmont is incorporated under the laws of the state of North Carolina and is engaged in the business of transporting, distributing, and selling natural gas in the states of Tennessee, North Carolina, and South Carolina.
2. Piedmont’s natural gas distribution business in Tennessee is subject to regulation and supervision by the Commission pursuant to Chapter 4 of Title 65 of the Tennessee Code Annotated.
3. Piedmont has its principal offices in Tennessee at 83 Century Boulevard, Nashville, Tennessee, and is engaged in the business of furnishing natural gas to customers located in Nashville and the remainder of Davidson County as well as portions of the counties of Cheatham, Dickson, Robertson, Rutherford, Sumner, Trousdale, Williamson, and Wilson and in certain incorporated towns and cities located therein.

4. Under TPUC Rule 1220-04-05-.26(1)(e), gas utilities, including Piedmont, are required to “make periodic tests of meters, associated devices and instruments, to assure their accuracy.” These tests are to be “scheduled within the calendar year” unless otherwise authorized by the Commission.

5. Every residential and commercial meter on Piedmont’s system currently contains an encoder receiver transmitter (“ERT”), a device that transmits the meter read to the Company for billing purposes. Silicone chips are a key material used in ERTs.

6. Meter testing requires the disposal of the old ERT and placement of a new ERT into the meter upon completion of testing.

7. Due to recent global supply chain issues related to silicone chips, Itron, Inc. (“Itron”), Piedmont’s supplier of ERTs, recently notified the Company that its supply of ERTs has been halted. As such, Itron is currently unable to supply ERTs to Piedmont. Itron predicts that it will be able to resume its supply of ERTs to Piedmont at the end of 2022. Therefore, Piedmont’s supply of ERTs is currently limited to the ERTs it holds in inventory.

8. Piedmont needs to conserve its current inventoried supply of ERTs in order to ensure availability for the purposes of connecting new customers and maintaining service to existing customers whose existing ERT may need replacement. Accordingly, Piedmont requests authorization to suspend its routine meter testing activities pursuant to the Statistical Meter Sampling Program for the remainder of calendar year 2022. If Piedmont is not granted authorization to suspend its Statistical Meter Sampling Program, the Company predicts that its current supply of ERTs will be exhausted by sometime in May 2022.

9. Piedmont is currently evaluating other options to continue providing meters for new customers upon exhausting its current supply of ERTs.

10. Assuming the issues contributing to the current shortage of ERTs have been resolved by the end of 2022, Piedmont plans to resume the Program in 2023.

11. Piedmont has no cause for concern that suspension of the Program for calendar year 2022 will harm customers or increase the Company's overall operational risk inasmuch as the Company's experience is that our Statistical Meter Sampling Program has indicated that meters tested through that program were highly accurate.

12. Because the exhaustion of Piedmont's supply is imminent, Piedmont respectfully requests expedited resolution of the matter raised herein.

13. For all of the foregoing reasons, Piedmont respectfully requests authorization to immediately suspend its routine meter testing activities pursuant to the Program for calendar year 2022.

WHEREFORE, Piedmont respectfully requests that the Commission grant expedited authorization for the Company to suspend routine meter testing activities pursuant to its Statistical Meter Sampling Program for calendar year 2022.

Respectfully submitted this 28th day of April, 2022.

Piedmont Natural Gas Company, Inc.

By: /s/ Paul S. Davidson

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing *Petition Of Piedmont Natural Gas Company, Inc. For Waiver Of Meter Testing Under TPUC Rule 1220-04-05-.26(e)* is being served this date upon all of the parties to this docket electronically or by depositing a copy of the same in the United States Mail, First Class Postage Prepaid, at the addresses contained in the official service list in this proceeding.

This the 28th day of April, 2022.

/s/ Brooke M. Szymanski
Brooke M. Szymanski

STATE OF NORTH CAROLINA

VERIFICATION

COUNTY OF MECKLENBURG

Pia Powers, being duly sworn, deposes and says that she is Managing Director - Gas Rates & Regulatory of Piedmont Natural Gas Company, Inc., that as such, she has read the foregoing documents and knows the contents thereof; that the same are true of her own knowledge except as to those matters stated on information and belief and as to those she believes them to be true.

Pia Powers

Pia Powers

Mecklenburg County, North Carolina

Signed and sworn to before me this day by Pia Powers

Date: 04/27/2022

[Signature]

Notary Public

(Official Seal)

My commission expires: 05/02/2023

<p>O'Hagi M. McGriff Notary Public Mecklenburg County, NC My Commission Exp <u>05/02/2023</u></p>
