

BEFORE THE TENNESSEE PUBLIC UTILITY COMMISSION

NASHVILLE, TENNESSEE

July 25, 2022

IN RE:)	
)	
PETITION OF PIEDMONT NATURAL GAS)	DOCKET NO.
COMPANY, INC. FOR WAIVER OF PERIODIC)	22-00038
METER TESTING UNDER TPUC RULE 1220-04-05-)	
.26(1)(e))	

ORDER GRANTING WAIVER
OF TPUC RULE 1220-04-05-.26(1)(E) THROUGH YEAR-END 2022

This matter came before Chairman Kenneth C. Hill, Vice Chairman Herbert H. Hilliard, Commissioner Clay R. Good, Commissioner John Hie, and Commissioner David F. Jones,¹ the voting panel of the Tennessee Public Utility Commission (“Commission” or “TPUC”), during the regularly scheduled Commission Conference held on June 20, 2022, to consider the *Petition of Piedmont Natural Gas Company, Inc. for Waiver of Periodic Meter Testing Under TPUC Rule 1220-04-05-.26(1)(e)* (“*Petition*”) filed on April 28, 2022, by Piedmont Natural Gas Company, Inc. (“Piedmont” or “Company”).

THE PETITION

On April 28, 2022, the Company filed a *Petition* requesting that the Commission waive its annual meter testing requirement for gas utilities set forth under TPUC Rule 1220-04-05-.26(1)(e), which states as follows:

Unless otherwise authorized by the Commission each utility shall make periodic tests of meters, associated devices and instruments, to assure their accuracy. Such tests shall be scheduled within the calendar year, or earlier, when the interval shall

¹ Commissioner Jones was not present and did not vote in this matter.

not be longer than provided for in the following schedule where applicable. (Note: Maintenance programs suggested by manufacturers of the following meters and devices should be carefully followed.)

1. Positive displacement meters	
(i) Up to 250 c.f. / hr.	10 years
(ii) 250 c.f. / hr.	7 years
2. Orifice meters	6 months
(i) Plates and Tubes	2 years
3. Base pressure correcting devices	2 years
4. Base volume correcting devices	2 years
5. Secondary standards	
(i) Test bottles, one cubic foot	10 years
(ii) Dead weight testers	6 months—minimum
6. Working standards	
(i) Bell provers.....	3 years
(ii) Rotary displacement test meters	5 years
(iii) Flow provers	5 years
(iv) Laboratory quality indicating pressure gauges	6 months
(v) Temperature recorders	6 months
(vi) Gravimeters	6 months

In its *Petition*, Piedmont requests that the meter testing requirements be waived for the remainder of calendar year 2022 due to a global silicone chip shortage related to supply chain issues, which has disrupted its ability to complete the required testing as scheduled.² Every residential and commercial meter on Piedmont’s system currently contains an encoder receiver transmitter (“ERT”), which is a device that transmits meter data to the Company for billing purposes. Meter testing requires the removal and disposal of the old ERT and insertion of a new ERT upon a test’s completion. Silicone chips are key components of ERTs and, due to the global chip supply chain issues, Piedmont’s supplier has halted its distribution of ERTs.³ Piedmont states that though they have an inventory of ERTs, those units are earmarked for new customers and existing customers needing replacements.⁴

² *Petition*, p. 2.

³ *Id.*

⁴ *Id.*

Piedmont asserts that its supplier expects to resume ERT distribution by the end of 2022 and that, without a waiver, its ERT supply will be exhausted May 2022. Assuming its supplier resumes ERT distribution by year-end, Piedmont intends to resume meter testing in 2023.⁵ Further, Piedmont asserts that a waiver of periodic meter testing for the remainder of 2022 will not harm customers or increase the Company's operational risk.⁶

FINDINGS AND CONCLUSIONS

During the regularly scheduled Commission Conference held on June 20, 2022, the voting panel heard, considered, and unanimously approved the *Petition*. Based upon a review of the Company's presentation and the administrative record in its entirety, the hearing panel found that the Company's temporary suspension of its meter testing program, due to a global silicone chip shortage and related supply chain issues, was reasonable and constitutes good cause for waiver of its meter testing requirements for the remainder of calendar year 2022. No one sought to intervene in the docket proceedings. During the hearing, members of the public were given an opportunity to offer comments, but no one sought recognition to do so. As such, the panel approved the *Petition*, as filed.

IT IS THEREFORE ORDERED THAT:

1. The *Petition of Piedmont Natural Gas Company, Inc. for Waiver of Periodic Meter Testing Under TPUC Rule 1220-04-05-.26(1)(e)* filed on April 28, 2022, by Piedmont Natural Gas Company, Inc. is approved.
2. Any party aggrieved by the Commission's decision in this matter may file a Petition for Reconsideration with the Commission within fifteen (15) days from the date of this Order.
3. Any party aggrieved by the Commission's decision in this matter has the right to

⁵ *Id.* at 3.

⁶ *Id.*

judicial review by filing a Petition for Review in the Tennessee Court of Appeals, Middle Section,
within sixty (60) days from the date of this Order.

FOR THE TENNESSEE PUBLIC UTILITY COMMISSION:

**Chairman Kenneth C. Hill,
Vice Chairman Herbert H. Hilliard,
Commissioner Clay R. Good, and
Commissioner John Hie, concurring.**

None dissenting.

ATTEST:

A handwritten signature in cursive script, appearing to read "Earl Taylor", written in black ink.

Earl R. Taylor, Executive Director