

STATE OF TENNESSEE

Office of the Attorney General



JONATHAN SKRMETTI
ATTORNEY GENERAL AND REPORTER

P.O. BOX 20207, NASHVILLE, TN 37202
TELEPHONE (615) 741-3491
FACSIMILE (615) 741-2009

February 2, 2023

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

Electronically Filed in TPUC Docket
Room on February 2, 2023 at 8:52 a.m.

Re: Records Request Related to Piedmont Natural Gas Company, Inc. Annual Performance Incentive Plan Report for the Period July 1, 2021 Through June 30, 2022 (Docket No. 22-00086)

Dear Ms. Cashman-Grams:

Pursuant to Tenn. Code Ann. § 65-4-118(b)(2), the Consumer Advocate Division of the Tennessee Attorney General's Office ("Consumer Advocate") respectfully requests the Tennessee Public Utility Commission ("TPUC") to furnish the following records which the Consumer Advocate believes TPUC may possess that are needed for the Consumer Advocate's analysis in the above-referenced docket. The records requested are as follows:

1. All confidential and non-confidential filings in TPUC Docket No. 22-00086;
2. Specifically, all quarterly filings by Piedmont Natural Gas Company, Inc. ("Piedmont") of shared costs and savings calculations pursuant to "Service Schedule No. 316" attached to the Compliance Audit Report adopted by TPUC on September 15, 2022, in TPUC Docket No. 21-00102; and
3. All Staff-issued data requests to Piedmont related to TPUC Docket No. 22-00086 and all responses from Piedmont to such requests.

The Consumer Advocate would note that it was granted intervention in this docket on November 3, 2022. Thank you for your time and consideration of this matter. If you have questions regarding this request, please contact me at (615) 741-2357.

Respectfully,

A handwritten signature in blue ink that reads "Mason C. Rush".

Mason C. Rush
Assistant Attorney General

cc: All Parties of Record