

**IN THE TENNESSEE PUBLIC UTILITY COMMISSION
AT NASHVILLE, TENNESSEE**

IN RE:

**PETITION OF PIEDMONT NATURAL
GAS COMPANY, INC. FOR APPROVAL
OF SERVICE SCHEDULE NO. 319 TO ITS
TENNESSEE SERVICE REGULATIONS**

DOCKET No. 22-00130

PETITION TO INTERVENE

The Consumer Advocate Division of the Office of the Tennessee Attorney General (“Consumer Advocate”), by and through Jonathan Skrmetti, Attorney General and Reporter for the State of Tennessee, pursuant to Tenn. Code Ann. § 65-4-118, respectfully petitions the Tennessee Public Utility Commission (“TPUC” or the “Commission”) to grant the Consumer Advocate’s intervention into this proceeding because consumers’ interests, rights, duties, or privileges may be determined or affected by the *Petition of Piedmont Natural Gas Company, Inc. for Approval of Service Schedule No. 319 to its Tennessee Service Regulations* filed in this Docket. For cause, the Consumer Advocate would show as follows:

1. The Consumer Advocate is authorized by Tenn. Code Ann. § 65-4-118 to represent the interests of Tennessee consumers of public utility services by initiating and intervening as a party in any matter or proceeding before the Commission in accordance with the Uniform Administrative Procedures Act (Tenn. Code Ann. §§ 4-5-101, *et seq.*) and TPUC rules.

2. Piedmont Natural Gas Company, Inc. (“Piedmont” or the “Company”), a subsidiary of Duke Energy Corporation, is a public utility regulated by TPUC and is in the business of transporting, distributing, and selling natural gas to approximately 191,000 residential, commercial, and industrial customers in the State of Tennessee, as well as customers in North

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Carolina and South Carolina. Within Tennessee, Piedmont provides service in Cheatham, Davidson, Dickson, Robertson, Rutherford, Sumner, Trousdale, Williamson, and Wilson Counties. Piedmont's principal office and place of business is 4720 Piedmont Row Drive, Charlotte, North Carolina 28210.¹

3. On November 29, 2022, the Company filed *Petition of Piedmont Natural Gas Company, Inc. for Approval of Service Schedule No. 319 to its Tennessee Service Regulations* ("Petition") with the Commission seeking the inclusion of Service Schedule No. 319 ("Rider") and an accounting order to maintain a deferred account to record costs and revenues associated with the Rider.²

4. The purpose of the Rider stated in the Company's *Petition* is to initiate a voluntary customer program called GreenEdgeSM.³ The GreenEdgeSM program will allow certain customers the ability to offset the carbon emissions associated with natural gas usage through direct funding of the Company's purchase of environmental attributes.⁴

5. Although the Company indicates in its *Petition* that it will defer the costs of the program such that non-participating customers will not be harmed, the Consumer Advocate would like to affirm this claim by further analyzing the detail of the accounting proposal and ensuring that all appropriate costs will be deferred. Additionally, the Consumer Advocate would like an opportunity to evaluate whether the proposed \$3.00 charge is reasonable, whether the planned acquisition of environmental attributes produces the claimed carbon offsets, and whether there are

¹ Piedmont Natural Gas Company's information is available at <https://www.piedmontng.com/our-company/about-piedmont>.

² *Petition of Piedmont Natural Gas Company, Inc. for Approval of Service Schedule No. 319 to its Tennessee Service Regulations*, TPUC Docket No. 22-00130 (Nov. 29, 2022).

³ *Id.* at 1.

⁴ *Id.*

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appropriate safeguards for those consumers receiving Low Income Housing Energy Assistance Program funds from incurring additional charges related to the proposed GreenEdgeSM program. Finally, the Company's proposal may result in additional tax implications from both the increased revenue from ratepayers and the acquisition of the environmental attributes.

6. The Consumer Advocate determined that the interest of consumers will be affected by the Commission's determinations and orders concerning (a) the interpretation, application, and implementation of Tenn. Code Ann. § 65-5-103(a), Tenn. Comp. R. & Regs. 1220-04-01-.06, and other relevant statutory and regulatory provisions, and (b) the review and analysis of Piedmont's proposed tariff, supporting documentation, financial and accounting records, and other materials. As the interests of Tennessee consumers may be determined in this proceeding, the Consumer Advocate qualifies by provision of law, Tenn. Code Ann. § 65-4-118(b)(1), as an intervenor in this matter to represent these interests.

7. Only by participating as a party to this proceeding can the Consumer Advocate adequately carry out its statutory duty to represent the interests of Tennessee consumers.

Wherefore, the Consumer Advocate requests the Commission grant this *Petition to Intervene*.

{Signatures on following page}

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RESPECTFULLY SUBMITTED,



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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served via U.S. Mail, with
a curtesy copy provided via electronic mail, upon:

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This the ____ day of December 2022.

Victoria B. Glover

VICTORIA B. GLOVER
Assistant Attorney General

by permission
KHS