

## Office of the Attorney General



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March 6, 2023

Chairman Herbert H. Hilliard  
c/o Ms. Tory Lawless, Docket Manager  
Tennessee Public Utility Commission  
502 Deaderick Street, 4<sup>th</sup> Floor  
Nashville, Tennessee 37242-0001

Re: Tennessee Public Utility Commission, Docket No. 22-000130, *Petition of Piedmont Natural Gas Company, Inc. to Offer the Voluntary GreenEdge Program and for the Commission to Issue an Accounting Order Authorizing the Company to Maintain a Deferred Account for Recording Associated Costs and Revenues.*

Dear Chairman Hilliard:

On November 29, 2022, Piedmont Natural Gas Company, Inc. ("Company") filed a petition ("Petition") with the Tennessee Public Utility Commission ("TPUC" or the "Commission") to approve (1) the inclusion of proposed Service Schedule No. 319 to Piedmont's Tennessee Tariff, pursuant to TPUC Rule 1220-04-01-.06, which would set forth a rider for a new voluntary customer program called GreenEdgeSM ("GreenEdgeSM Program"), and (2) an accounting order for regulatory and financial accounting purposes authorizing the Company to maintain a deferred account for the purposes of recording the costs and revenues associated with the rider. The GreenEdgeSM Program is designed to enable certain customers the option to offset carbon emissions associated with their natural gas usage through direct funding of the Company's purchase of environmental attributes.<sup>1</sup> The Consumer Advocate Division of the Tennessee Attorney General's Office ("Consumer Advocate") intervened in this docket for the purpose of affirming claims that the implementation of such a program will not harm non-participating customers. After reviewing information and answers shared through the discovery process, the Consumer Advocate is satisfied based on the safeguards and accounting principles described in the Company's Petition that the program will not harm non-participating customers.

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<sup>1</sup> *Piedmont Natural Gas Company, Inc. to Offer the Voluntary GreenEdge Program and for the Commission to Issue an Accounting Order Authorizing the Company to Maintain a Deferred Account for Recording Associated Costs and Revenues*, TPUC Docket No. 22-00130 (November 29, 2022), at 1.

The Consumer Advocate notes that its position at this time is predicated on the accounting safeguards referenced in testimony and neither explicitly nor implicitly endorses the program. The GreenEdgeSM Program is a voluntary program. The program's purpose is to make it convenient for Company's customers, who wish to offset their usage of natural gas or overall affect their carbon footprint, to pay additional fees for environmental attributes. The Consumer Advocate does not find this program necessary for the general provision of gas services. The Consumer Advocate asks for continued cooperation from the Company to provide additional information in their annual reporting on the GreenEdgeSM Program as it is implemented, namely (1) the number of customers; by class, contacted to enroll in the program; (2) materials used to solicit the program; (3) the number of customers, by class, opting into the program; (4) a listing of the third party or third parties used to procure the environmental attributes, including the number of attributes purchased by procurer, listing of accreditations for each procurer, proof of certification, and whether the environmental attributes purchased comply with the requirements of a labelling scheme.

Nevertheless, after discussions with the Company and considering the entire record, the Consumer Advocate submits that there remain no outstanding procedural matters requiring resolution by the Hearing Officer. Moreover, it is the Consumer Advocate's position that there remain no contested issues between the parties with respect to this docket and, unless otherwise requested by the Commission, hereby waives the filing of pre-filed testimony by its expert, David Dittemore, opening and closing statements, and cross examination of witnesses by the Company.

As required, an original of this filing, along with four hard copies, will follow. Should there be any questions concerning this filing, or additional information, please do not hesitate to contact me.

Respectfully,

A handwritten signature in black ink, appearing to read 'Victoria B. Glover', with a stylized, cursive script.

Victoria B. Glover  
Assistant Attorney General

cc: Monica Smith-Ashford, Esq.  
Paul Davidson, Esq.  
James H. Jeffries IV, Esq.  
Pia Powers