

# Holland & Knight

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Electronically Filed in TPUC Docket  
Room on July 27, 2023 at 9:12 a.m.

July 27, 2023

**VIA ELECTRONIC MAIL**

Mr. David Jones, Chairman  
c/o Ectory Lawless  
Tennessee Public Utility Commission  
502 Deaderick Street, Fourth Floor  
Nashville, Tennessee 37243

**Re: Petition of Piedmont Natural Gas Company, Inc. For Approval of its  
2023 Annual Review of Rates Mechanism Pursuant to Tenn. Code  
Ann. § 65-5-103(d)(6)  
Docket No. 23-00035**

Dear Chairman Jones:

Pursuant to the Joint Procedural Schedule, enclosed for filing please find an original and four (4) copies of Piedmont Natural Gas Company, Inc.'s ("Piedmont") supplemental response to the Consumer Advocate Division's *Second Discovery Request* in the above-referenced docket.

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 a "filed" stamped copy of the same via email.

If you have any questions regarding these responses, you may reach me at the number shown above.

Sincerely yours,

HOLLAND & KNIGHT LLP



Paul S. Davidson  
Equity Partner

PSD:jv  
Enclosures

Atlanta | Austin | Birmingham | Boston | Century City | Charlotte | Chattanooga | Chicago | Dallas | Denver | Fort Lauderdale  
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cc: Pia Powers  
Brian Heslin  
James H. Jeffries IV  
Brian Franklin  
Kelly Cashman-Grams  
Michelle Mairs  
David Foster  
Karen Stachowski  
Victoria Glover

**PIEDMONT NATURAL GAS COMPANY, INC.**  
**DOCKET NO. 23-00035**  
**CONSUMER ADVOCATE'S SECOND SET OF DISCOVERY REQUESTS**  
**Date Issued: June 28, 2023**  
**Date Due: As soon as possible**

- 2-18. Explanation and Identification. Refer to the Company's Response to Consumer Advocate DR No. 1-57. Does the capitalized labor reflected in this include any labor charges from Piedmont's Charlotte, North Carolina based employees? Identify the capitalized labor from Charlotte, North Carolina based employees charged to Piedmont's Tennessee work in progress in 2022.

**SUPPLEMENTAL RESPONSE:** Please see the attachment provided herewith.

**Name and title of responsible person:** Kally Couzens, Manager - Rates & Regulatory Strategy

**Name and title of preparer:** Misty Roddey, Rates & Regulatory Strategy Analyst - Interim Assignment

Supplemental Response provided by Piedmont Natural Gas Company, Inc. on July 24, 2023.

**PIEDMONT NATURAL GAS COMPANY, INC.**  
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2-18 Supplemental Attachment

Attachment Provided in Native Format