

BEFORE THE TENNESSEE PUBLIC UTILITY COMMISSION

NASHVILLE, TENNESSEE

July 5, 2024

IN RE:	)	
	)	
PIEDMONT NATURAL GAS	)	Docket No. 24-00031
WEATHER NORMALIZATION ADJ. (WNA) AUDIT)		

**NOTICE OF FILING BY THE UTILITIES DIVISION OF THE TENNESSEE
PUBLIC UTILITY COMMISSION**

Pursuant to Tenn. Code Ann. §§65-4-104, 65-4-111 and 65-3-108, the Utilities Division of the Tennessee Public Utility Commission (“TPUC” or “Commission”) hereby gives notice of its filing of the Piedmont Natural Gas WNA Audit Report in this docket and would respectfully state as follows:

1. The present docket was opened by the Commission to hear matters arising out of the audit of Piedmont Natural Gas (the “Company”).
2. The Company’s WNA filings were received for the period October 1, 2023, through April 30, 2024, and the Staff completed its audit of same on June 28, 2024.
3. On June 24, 2024, the Utilities Division submitted its preliminary WNA audit finding to the Company via e-mail. The Company responded on June 25, 2024, via e-mail and this response has been incorporated into the final report. The Report is attached to this Notice as Exhibit A and is fully incorporated herein by this reference.

4. The Utilities Division hereby files its Report with the Tennessee Public Utility Commission for deposit as a public record and approval of the Report and recommendations contained therein.

Respectfully Submitted:

A handwritten signature in black ink, reading "Emily Qingshe". The script is cursive and fluid, with the first name "Emily" and last name "Qingshe" clearly distinguishable.

Emily Qingshe, CPA, CFA
Audit Manager
Utilities Division of the
Tennessee Public Utility Commission

CERTIFICATE OF SERVICE

I hereby certify that on this 5th day of July 2024 a true and exact copy of the foregoing has been either hand-delivered or delivered via U.S. Mail, postage pre-paid, to the following persons:

Mr. David Jones
Chair
Tennessee Public Utility Commission
502 Deaderick Street
Nashville, TN 37243

Ms. Pia Powers
Director – Regulatory Affairs
Piedmont Natural Gas Company
P.O. Box 33068
Charlotte, North Carolina 28233

Ms. Kally Couzens
Manager-Gas Rates & Regulatory Strategy
Piedmont Natural Gas Company
P.O. Box 33068
Charlotte, NC 28233

Ms. Jenny Furr
Manager – Regulatory Reporting
Piedmont Natural Gas Company
PO Box 33068
Charlotte, NC 28233

Ms. Karen Stachowski
Office of the Attorney General
Consumer Advocate and Protection Division
P. O. Box 20207
Nashville, TN 37202



Emily Qingshe

EXHIBIT A

COMPLIANCE AUDIT REPORT

OF

PIEDMONT NATURAL GAS

WEATHER NORMALIZATION ADJUSTMENT (WNA) RIDER

DOCKET NO. 24-00031

TENNESSEE PUBLIC UTILITY COMMISSION

UTILITIES DIVISION

July 2024

COMPLIANCE AUDIT OF
Piedmont Natural Gas
WEATHER NORMALIZATION ADJUSTMENT (WNA) RIDER
Docket No. 24-00031

TABLE OF CONTENTS

	<u>PAGE NO.</u>
I. INTRODUCTION AND AUDIT OPINION	1
II. SCOPE OF AUDIT	1
III. BACKGROUND INFORMATION ON PIEDMONT NATURAL GAS COMPANY	2
IV. BACKGROUND ON WEATHER NORMALIZATION ADJUSTMENT (WNA) RIDER	2
V. IMPACT OF WNA RIDER	3
VI. CHART COMPARING ACTUAL TO NORMAL HEATING DEGREE DAYS	5
VII. WNA FINDINGS	6
VIII. CONCLUSIONS AND RECOMMENDATIONS	7
ATTACHMENT 1	
<u>SERVICE SCHEDULE NO. 315</u>	
<u>WEATHER NORMALIZATION ADJUSTMENT RIDER</u>	

COMPLIANCE AUDIT
PIEDMONT NATURAL GAS
WEATHER NORMALIZATION ADJUSTMENT (WNA) RIDER
Docket No. 24-00031

I. INTRODUCTION AND AUDIT OPINION

The subject of this compliance audit is the Weather Normalization Adjustment (“WNA”) Rider of Piedmont Natural Gas (“PNG,” “Piedmont” or the “Company”). The objective of this audit was to determine if the WNA adjustments were calculated correctly and applied to customers' bills appropriately between October 1, 2023 and April 30, 2024. As a result of the WNA Rider, the Company surcharged a net \$10,099,195.56 and \$4,684,293.26 to the residential and commercial customers respectively, during the period. The impact of WNA revenues on the Company’s total revenues is detailed in Section V, Table 1.

The audit produced one finding. Except for the finding reported in Section VII, Audit Staff (“Staff”) concludes that the Company correctly implemented the mechanics of the WNA Rider as specified by the Tennessee Public Utility Commission (“Commission”)¹ and included in the Company’s tariff (Attachment 1).

II. SCOPE OF AUDIT

In meeting the objective of the audit, the Staff compared the following on a daily basis:

- (1) The Company's actual heating degree days (ADD) to National Oceanic and Atmospheric Administration (“NOAA”) actual heating degree days;
- (2) The Company's normal heating degree days (NDD) to the normal heating degree days calculated in the last rate case; and
- (3) The Company's calculation of the WNA factors to Staff's independent calculation of the WNA factors for each billing cycle during the WNA period.

Staff also selected customer bill samples to verify that the WNA factor had been correctly applied to customer bills. In addition, Staff examined each sample bill to determine whether the Base Rates and Purchased Gas Adjustments and other billing adjustments were billed correctly. As a result of the bill audit, Staff maintains PNG is correctly billing its customers.

Grace Marek and Emily Qingshe of the Utilities Division conducted this audit.

¹ Effective April 5, 2017, the name of Tennessee Regulatory Authority was changed to the Tennessee Public Utility Commission and board members of the agency are now known as Commissioners rather than Directors.

III. BACKGROUND INFORMATION ON PIEDMONT NATURAL GAS

Piedmont Natural Gas Company corporate headquarters are located at 4720 Piedmont Row Drive, Charlotte, North Carolina. Local offices are located at 83 Century Blvd., Nashville, Tennessee. PNG is a natural gas distributor that provides service to Nashville and several other communities in the Middle Tennessee area, as well as service areas in North and South Carolina. The natural gas used to serve Tennessee is purchased from producers and marketers and transported to Nashville's city gate through the interstate transmission facilities of Tennessee Gas Pipeline (TGP), Columbia Gas Transmission Corporation (CGTC), Texas Eastern Gas Pipeline (TETCO), and Midwestern Gas Transmission Company (MGTC).

IV. BACKGROUND ON WEATHER NORMALIZATION ADJUSTMENT (WNA) RIDER

In setting rates, the Tennessee Public Utility Commission uses a normalized level of revenues and expenses for a test year, which is designed to be the most reasonable estimate of the Company's operations during the time the rates are to be in effect. Use of normalized operating levels eliminates unusual fluctuations that may occur during the test period, which causes rates to be set too high or too low.

Specifically, one part of normalizing revenues consists of either increasing or decreasing the test year weather related sales volumes to reflect the difference between the normal and actual heating degree days. (A heating degree day is calculated as the difference in the average daily temperature and 65 degrees Fahrenheit.) This average daily temperature constitutes normal weather and is determined based on the previous thirty years' weather data.²

Normal weather rarely occurs. This has two impacts:

- (1) The customers' bills fluctuate dramatically due to changes in weather from month to month; and
- (2) The gas companies earn more or less than their authorized rate of return. For example, if weather is colder than normal, then more gas than anticipated in the rate case will be sold. This results in higher customer bills and over-earnings for the company. On the other hand, if weather is warmer than normal, less gas than anticipated in the rate case will be sold, the customers' bills will be lower and the company will under-earn.

In recognition of this fact, on September 26, 1991, the Tennessee Public Service Commission³ ("TPSC") approved a three-year experimental Weather Normalization Adjustment Rider ("WNA Rider") to the tariffs of Chattanooga Gas Company, Nashville Gas Company, a division of Piedmont Natural Gas Company, Inc. and United Cities Gas

² Weather data is published monthly by the National Oceanic and Atmospheric Administration ("NOAA").

³ By legislative action, the Public Service Commission was replaced on July 1, 1996 by the Tennessee Regulatory Authority. See Act of May 24, 1995, ch. 305, 1995 Tenn. Pub. Acts 450. The TRA retains jurisdiction over the above named gas companies. See Tenn. Code Ann. § 65-4-104: see also Tenn. Code Ann. § 65-4-101 (a) (defining public utility).

Company.⁴ In periods of weather colder than normal, the customer receives a credit on his bill, while in periods of warmer than normal weather, the customer is billed a surcharge. Thus, customers' monthly bills should not fluctuate as dramatically and the gas company should have a more stable rate of return. The WNA Rider was to be applied to residential and commercial customers' bills during the months of October through May of each year. On June 21, 1994, the TPSC issued an Order authorizing the above mentioned gas companies to permanently implement an amended version of the WNA Rider.⁵

Piedmont Natural Gas was authorized to calculate WNA adjustments during the months of November through March of each year until its last rate case in Docket No. 11-00144 when the WNA period was extended to October through April effective March 1, 2012.⁶ The TPUC Staff audits these calculations annually.

V. IMPACT OF WNA RIDER

The table below quantifies the number of actual heating degree days by month as compared to the normal heating degree days for that month. It shows that during the audit period, the weather (overall) was warmer than normal, resulting in a net surcharge from Piedmont to its customers for the period. See also the graph on page 5 which visually compares the actual heating degree days to normal heating degree days for Piedmont during the 2023-2024 heating season.

<i>Month</i>	Actual Heating Degree Days	Normal Heating Degree Days	Warmer/Colder than Normal
September 2023	0	14.9	Warmer
October 2023	120	162.1	Warmer
November 2023	364	448.8	Warmer
December 2023	580	685.6	Warmer
January 2024	871	795.8	Warmer
February 2024	398	619.9	Warmer
March 2024	305	434.6	Warmer
April 2024	131	192.5	Warmer
Total	2,769	3,354.2	Warmer

Since the overall weather during the October 1, 2023 through April 30, 2024 period was warmer than normal, the net impact of the WNA Rider was that residential and

⁴ See petition of Chattanooga Gas Company, Nashville Gas Company, a Division of Piedmont Natural Gas Company, Inc. and United Cities Gas Company for a Rulemaking Hearing to Adopt a Weather Normalization Adjustment (WNA) Rider, Docket No. 91-01712, *Order* (September 26, 1991).

⁵ The amendment directed Chattanooga Gas Company and United Cities Gas Company to eliminate from their WNA Rider the shoulder months of October and May, and Nashville Gas Company to eliminate the shoulder months of October, April and May.

⁶ See *In Re: Petition of Piedmont Natural Gas Company, Inc. for an Adjustment to Its Rates, Approval of Changes to its Rate Design, Amortization of Certain Deferred Assets, Approval of New Depreciation rates, Approval of Revised Tariffs and Service Regulations, and Approval of a New Energy Efficiency Program and GTI Funding*, Docket No. 11-00144, *Order*, p. 14.

commercial customers were **surcharged** \$10,099,195.56 and \$4,684,293.26 respectively. This equates to an increase to total residential and commercial sales revenues of 7.61% and 6.36%, respectively (See Table 1). This is an decrease from the WNA surcharges in the previous year when the residential and commercial customers were **surcharged** a net of \$10,581,970.20 and \$5,167,459.16 respectively. Table 2 below compares the WNA charges/ (refunds) over the last three (3) winter heating seasons

Table 1

**Impact of WNA Rider on Residential & Commercial Revenues
October 1, 2023 - April 30, 2024**

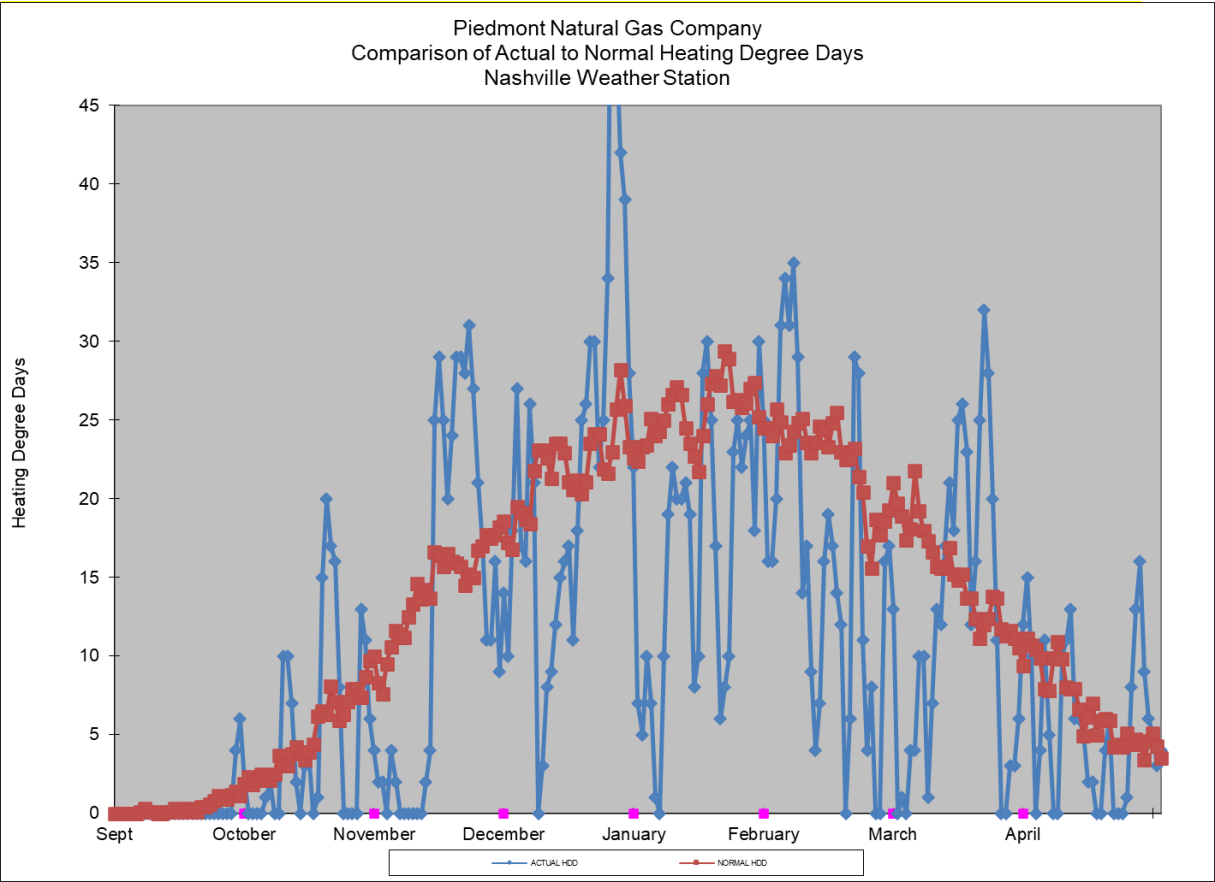
	<u>WNA Rider Revenues</u>	<u>Total Revenues</u>	Percentage Impact of WNA Rider on Revenue
Residential Sales	\$10,099,196	\$132,762,046	7.61%
Commercial Sales	<u>4,684,293</u>	<u>73,671,256</u>	6.36%
Total	<u>\$ 14,783,489</u>	<u>\$ 206,433,302</u>	7.16%

Table 2

**Amount Surcharged (Refunded)
2021 - 2024**

	<u>Residential</u>	<u>Commercial</u>	Total <u>Surcharge/(Refund)</u>
10/23-4/24	\$10,099,196	\$4,684,293	\$14,783,489
10/22-4/23	10,581,970	5,167,459	15,749,429
10/21-4/22	6,536,684	3,148,366	9,685,050
Total	<u>\$27,217,850</u>	<u>\$13,000,118</u>	<u>\$40,217,968</u>

VI. CHART COMPARING ACTUAL TO NORMAL HEATING DEGREE DAYS



VII. WNA FINDINGS

As noted in Section I of this report, Staff's audit resulted in one finding for the winter heating season of October 2023 through April 2024. This finding is described in detail below.

FINDING #1:

Exception:

The Company used incorrect normal heating degree days on November 23, 2023 and February 26, 2024 in its weather normalization calculations.

Discussion:

The Company incorrectly used actual heating degree days for two days in the period, which resulted in inaccurate WNA factors being billed over thirty-eight (38) billing cycles. The error affects Cycle 21 in November through Cycle 18 in December and Cycle 21 in February through Cycle 18 in March.

This error is due to the difference in daily heating degree days published in NOAA's Local Climatological Data Summary report⁷ and the daily heating degree days that the Company used in calculating its WNA factors.⁸ In order to timely bill its customers, the Company must obtain actual degree day information from its weather information source(s) on a real time basis, prior to any subsequent revisions by NOAA. The WNA Rider and the Staff's audit of this Rider are based on the official NOAA publication, which is released approximately two months later. Therefore, Staff recognizes that discrepancies can be caused by the Company's weather information source through no fault of the Company.

Date	Company Actual Degree Days	NOAA Actual Degree Days	Difference
11/23/2023	17.8	20	2.2
2/26/2024	6	0	(-6.0)
		TOTAL	(-3.8)

The result of this error was a total **net under-collection** of WNA revenues from customers of **\$159,687**.

Recommendation:

Since the dollar amount of this finding is immaterial on a per customer basis, Staff recommends including the under-collection in the Company's next Actual Cost Adjustment filing, rather than identifying and refunding to specific customers.

Company Response:

Piedmont has no objection to Staff's recommendation.

⁷ This published report is the official data supplied by NOAA known as the *Local Climatological Data Daily Summary* after undergoing all final revisions and the final quality control by the National Climatic Data Center, and is the standard that the Staff uses to audit the Weather Normalization Rider.

⁸ See Table for detail of the differences.

VIII. WNA CONCLUSIONS AND RECOMMENDATIONS

Based on Staff's review of the WNA adjustments during the period October 1, 2023 through April 30, 2024, as stated in its Audit Opinion in Section I, Staff found one immaterial finding and concludes that PNG is correctly implementing the mechanics of the WNA Rider to its tariff. Based on its analysis, Staff recommends that the Company include the **\$159,687 under-collection** in the next Actual Cost Adjustment filing, with the Tennessee Public Utility Commission. Piedmont has agreed to do so.

In general, WNA Audit filings historically have been immaterial when spread over the customer base that are subject to the weather adjustments. There is no mechanism within the Weather Normalization Adjustment Rider to true up any over- or under-recoveries. Since identifying and rebilling individual customers would be cost prohibitive, Staff recommends in those cases that the finding amounts be charged or credited to the Company's Actual Cost Adjustment (ACA) Account, which covers essentially the same customer base. Staff then reviews subsequent ACA filings to verify that this has been done.

Staff checked Piedmont's last ACA filings in Docket No. 23-00060, covering the period July 2022 to June 2023. In this ACA filing, the Company incorporated the adjustment of \$38,548, which aligned with the finding identified in WNA Docket No. 23-00044. Therefore, the finding identified in the previous audit has been appropriately remedied.

Staff, therefore, recommends that the Commission approve Staff's Audit Report, the finding, and conclusions therein.

Staff appreciates and thanks the Company staff for cooperating during this audit process.

ATTACHMENT 1

SERVICE SCHEDULE NO. 315

Weather Normalization Adjustment

(WNA) Rider

I. Provision for Adjustment

The base rates per therm (100,000 Btu) for gas service set forth in any rate schedules utilized by the Authority in determining normalized test period revenues shall be adjusted by an amount hereinafter described, which amount is referred to as the "Weather Normalization Adjustment".

The Weather Normalization Adjustment will be applicable for bills rendered on and after October 1 and continuing through the final billing cycle in April of each year.

C

II. Definitions

For the purposes of this Rider:

"Authority" means the Tennessee Regulatory Authority.

"Relevant Rate Order" means the final order of the Authority in the most recent litigated rate case of the Company fixing the rates of the Company or the most recent final order of the Authority specifically prescribing or fixing the factors and procedures to be used in the application of this Rider.

III. Computation of Weather Normalization Adjustment

The Weather Normalization Adjustment shall be computed to the nearest one-hundredth cent per therm by the following formula:

$$WNA_i = R_i \quad * \quad \frac{(HSF_i(NDD-ADD))}{(BL_i + (HSF_i \times ADD))}$$

Where:

- $I =$ any particular rate schedule or billing classification within any particular rate schedule that contains more than one billing classification.
- $WNA_i =$ Weather Normalization Adjustment Factor for the i^{th} rate schedule or classification expressed in cents per therm.
- $R_i =$ weighted average base rate (base rate less any embedded gas cost) of temperature sensitive sales for the i^{th} schedule or classification utilized by the Authority in the Relevant Rate Order for the purpose of determining normalized test year revenues.

- $HSF_i =$ heat sensitive factor for the i^{th} schedule or classification utilized by the Authority in the Relevant Rate Order for the purpose of determining normalized test year revenues.
- $NDD =$ normal billing cycle heating degree days utilized by the Authority in the Relevant Rate Order for the purpose of determining normalized test year revenues.
- $ADD =$ actual billing cycle heating degree days.
- $BL_i =$ base load sales for the i^{th} schedule or classification utilized by the Authority in the Relevant Rate Order for the purpose of determining normalized test year revenues.

IV. Filing with Authority

The Company will file as directed by the Authority (a) a copy of each computation of the Weather Normalization Adjustment, (b) a schedule showing the effective date of each such Weather Normalization Adjustment, and a schedule showing the factors or values derived from the Relevant Rate Order used in calculating such Weather Normalization Adjustment.