

**BEFORE THE TENNESSEE PUBLIC UTILITY COMMISSION
NASHVILLE, TENNESSEE**

IN RE:)	
)	
PETITION OF PIEDMONT NATURAL)	
GAS COMPANY, INC. FOR APPROVAL)	
OF ITS 2024 ANNUAL REVIEW OF)	Docket No. 24-00036
RATES MECHANISM PURSUANT TO)	
TENN. CODE ANN. § 65-5-103(d)(6))	
)	

MOTION TO APPEAR PRO HAC VICE

Piedmont Natural Gas Company, Inc. (“Piedmont”), pursuant to Tennessee Supreme Court Rule 19(d), moves the Tennessee Public Utility Commission (“Commission”) to grant permission for Brian L. Franklin to appear *pro hac vice* on its behalf in the above-captioned docket. In support of this motion, movant respectfully shows unto the Commission, as follows:

1. Mr. Franklin is a licensed attorney in the State of North Carolina, a member of the Bar of such State in good standing, and is authorized to practice before the North Carolina Supreme Court.
2. Mr. Franklin is in good standing in all jurisdictions, courts and administrative agencies where Mr. Franklin is authorized or has been permitted to practice law.
3. Mr. Franklin has been retained by Piedmont to represent its interests in the above-captioned proceeding.
4. Pursuant to Tennessee Supreme Court Rule 19(g), Mr. Franklin is associated in this proceeding with Paul Davidson, Holland & Knight LLP, 511 Union Street, Suite 2700, Nashville, Tennessee, a lawyer licensed to practice law in Tennessee, in good standing and admitted to practice law before the Supreme Court of Tennessee.

5. Pursuant to Tennessee Supreme Court Rule 19(f), Mr. Franklin has filed with the Board of Professional Responsibility of the Supreme Court of Tennessee a copy of this motion along with the supporting documentation and paid all fees required in connection with this motion to appear *pro hac vice*.

6. Mr. Franklin's affidavit containing the information required by Tennessee Supreme Court Rule 19(d) is attached to this motion as Exhibit A and includes a certificate of good standing from the Supreme Court of the State of North Carolina.

7. The undersigned counsel for Piedmont has discussed the relief sought in this motion with representatives of the Consumer Advocate and Protection Division of the Office of the Attorney General and Reporter ("Consumer Advocate") and is authorized to advise the Commission that the Consumer Advocate has no objection to Mr. Franklin's appearance *pro hac vice* in this docket.

WHEREFORE, Piedmont moves the Commission to permit his appearance on behalf of Piedmont Natural Gas Company, Inc. in the above-captioned proceeding.

Respectfully submitted this 10th day of June, 2024.

Piedmont Natural Gas Company, Inc.

By: /s/ Paul S. Davidson
Paul S. Davidson
Holland & Knight LLP
511 Union Street, Suite 2700
Nashville, Tennessee 37219
Phone: (615) 850-8942
Email: paul.davidson@hklaw.com

Piedmont Natural Gas Company, Inc.
2024 Annual ARM Filing
Docket No. 24-00036

EXHIBIT A

BEFORE THE TENNESSEE PUBLIC UTILITY COMMISSION
NASHVILLE, TENNESSEE

IN RE:

PETITION OF PIEDMONT NATURAL
GAS COMPANY, INC. FOR APPROVAL
OF ITS 2024 ANNUAL REVIEW OF
RATES MECHANISM PURSUANT TO
TENN. CODE ANN. § 65-5-103(d)(6)

Docket No. 24-00036

AFFIDAVIT OF BRIAN L. FRANKLIN

Comes now Affiant Brian L. Franklin, having been duly sworn, and states as follows:

1. I reside at [REDACTED]

[REDACTED]. I am an attorney and a member of the law firm of McGuireWoods LLP with offices at 201 North Tryon Street, Suite 3000, Charlotte, Mecklenburg County, North Carolina, 28202-2146. My NC Bar Number is 35075. I have been retained personally or as a member of the above-named law firm by Piedmont Natural Gas Company, Inc. to provide legal representation in connection with the above matter now pending before the Tennessee Public Utility Commission.

2. I have been admitted to practice before the following courts:

<u>Court</u>	<u>Date Admitted</u>
North Carolina Supreme Court	June 30, 2006
U.S. District Court, Northern District of Illinois	May 2001 ¹

I am presently a member in good standing of the bars of those courts listed above and have not been suspended or disbarred in any court.

3. I was admitted *pro hac vice* by the Tennessee Public Utility Commission in the following case:

¹ I elected to go to "retired" status in 2006 following my permanent relocation to North Carolina.

<u>TPUC Docket No.</u>	<u>Description</u>	<u>Date Admitted</u>
23-00035	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)	June 23, 2023

4. I have never had any application for admission *pro hac vice* in this or any other jurisdiction denied or any *pro hac vice* admission revoked.

5. I have never been disciplined or sanctioned by any lawyer disciplinary agency, or authority, in any jurisdiction.

6. I presently am not subject to any suspension or disbarment proceedings, and have not been formally notified of any complaints pending before a disciplinary agency.

7. I agree to comply with the applicable statutes, laws and rules of the State of Tennessee and will familiarize myself with and comply with the Tennessee Rules of Professional Conduct.

8. I consent to the disciplinary jurisdiction of the Board of Professional Responsibility of the Supreme Court of Tennessee (“TN BPR”) and of the Tennessee Public Utility Commission.

9. Local counsel of record associated with applicant in this case is Paul S. Davidson of Holland & Knight LLP, 511 Union Street, Suite 2700 Nashville, Tennessee 37219, Telephone: 615-850-8942, Tennessee State Bar No. 011789.

10. I have paid all fees in connection with the accompanying motion to appear *pro hac vice*.

11. I am currently licensed as a *pro hac vice* attorney with the TN BPR through December 31, 2024, and my BPR License No. is PHV87646.

12. A copy of the motion to appear *pro hac vice*, and all associated papers, has been served upon all counsel of record in this proceeding and upon the Board of Professional Responsibility of the Supreme Court of Tennessee.

DATED this 31st day of May, 2024.

By:



Brian L. Franklin

McGuireWoods LLP

201 North Tryon Street, Suite 3000

Charlotte, North Carolina, 28202

Telephone: 704-343-2078

STATE OF NORTH CAROLINA

MECKLENBURG COUNTY

I certify that Brian L. Franklin personally appeared before me this day, acknowledging to me that he signed the forgoing document.

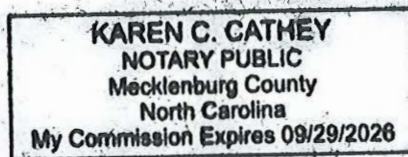
Witness my hand and notarial seal on this the 31st day of May, 2024.

(Place Notary Stamp Here)

Karen C. Cathey
Print Name

Karen C. Cathey
Notary Public

My Commission Expires: 9-29-2026



Supreme Court OF THE STATE OF NORTH CAROLINA



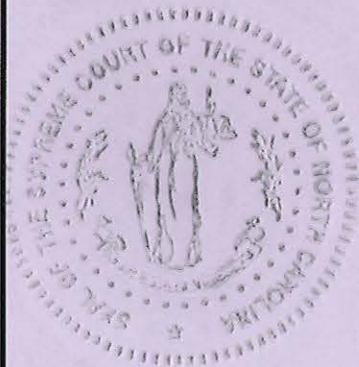
I, Grant E. Buckner, Clerk of the Supreme Court of North Carolina, do hereby certify that on June 30, 2006, license to practice as an Attorney and Counselor at Law in all the Courts of this State was issued by the North Carolina Board of Law Examiners to

Brian Lamont Franklin

according to the certified list of licentiates reported by the Secretary of said Board and filed in my office as required by statute.

To the date of this certificate, no order revoking said license has been filed with this Court and no order suspending same is in effect.

WITNESS my hand and the Seal of the Supreme Court of North Carolina at office in Raleigh, this May 21, 2024.



A handwritten signature in blue ink, which appears to read "Grant E. Buckner".

Grant E. Buckner
Clerk of the Supreme Court
of the State of North Carolina

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served via electronic mail upon the following:

Victoria B. Glover
Assistant Attorney General
Office of the Tennessee Attorney General
Consumer Advocate Division
P.O. Box 20207
Nashville, Tennessee 37202-0207
Email: Victoria.Glover@ag.tn.gov

Vance L. Broemel
Managing Attorney
Office of the Tennessee Attorney General
Consumer Advocate Division
P.O. Box 20207
Nashville, Tennessee 37202-0207
Email: Vance.Broemel@ag.tn.gov

This the 10th day of June 2024.

/s/ Paul S. Davidson
Paul S. Davidson