

# Holland & Knight

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Electronically Filed in TPUC Docket  
Room on June 25, 2024 at 2:38 p.m.

June 25, 2024

## **VIA ELECTRONIC MAIL**

Herbert H. Hilliard, 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  
2024 Annual Review of Rates Mechanism Pursuant to Tenn. Code  
Ann. § 65-5-103(d)(6)  
Docket No. 24-00036**

Dear Chairman Hilliard:

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" or the "Company") response to the Consumer Advocate Division's first informal discovery request in the above-referenced docket. On June 7, 2024, pursuant to a meeting with the Consumer Advocate, Piedmont agreed to provide a set of updated ARM Filing Schedules to reflect the use of the Company's existing approved depreciation rates, rather than the proposed depreciation rates used in its initial filing. These schedules were provided to the Consumer Advocate Division on June 10, 2024.

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 this request, you may reach me at the number shown above.

Atlanta | Austin | Birmingham | Boston | Century City | Charlotte | Chattanooga | Chicago | Dallas | Denver | Fort Lauderdale  
Houston | Jacksonville | Los Angeles | Miami | Nashville | Newport Beach | New York | Orlando | Philadelphia  
Portland | Richmond | San Francisco | Stamford | Tallahassee | Tampa | Tysons | Washington, D.C. | West Palm Beach

Chairman Hilliard  
June 25, 2024  
Page 2

Very truly yours,



Paul S. Davidson

PSD:mjv  
Enclosures

cc: Pia Powers  
Brian Heslin  
James H. Jeffries IV  
Brian Franklin  
Kelly Cashman-Grams  
Michelle Mairs  
David Foster  
Victoria Glover  
Vance Broemel

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the attached 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](mailto: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](mailto:Vance.Broemel@ag.tn.gov)

This the 25th day of June 2024.

/s/ Paul S. Davidson  
Paul S. Davidson

Piedmont Natural Gas Company, Inc.  
2024 ARM Annual Filing  
Historical Base Period Ending 12/31/23

File Name: ARM Filing Schedule Index  
Description of Schedule: List of Schedules Included in May 20, 2024 Filing - Updated for Existing Depreciation Rates:

				Native File Includes	
ARM Schedule Number	Schedule Description	File	Name of Native Format File	Confidential Information	Yes or No
ATTACHMENT NO. 1: UPDATED LEAD SCHEDULES					
Schedule No. 1	Results of Operations	Excel	Schedules 1 - 12_Lead Schedules_Exist Depr		No
Schedule No. 2	Rate Base	Excel	Schedules 1 - 12_Lead Schedules_Exist Depr		No
Schedule No. 3	Lead Lag Results	Excel	Schedules 1 - 12_Lead Schedules_Exist Depr		No
Schedule No. 4A	Working Capital Expense Lag for HBP	Excel	Schedules 1 - 12_Lead Schedules_Exist Depr		No
Schedule No. 4B	Working Capital Expense Lag for Annual Base Rate Reset	Excel	Schedules 1 - 12_Lead Schedules_Exist Depr		No
Schedule No. 5	O&M Expense Summary	Excel	Schedules 1 - 12_Lead Schedules_Exist Depr		No
Schedule No. 6A	Revenue Summary	Excel	Schedules 1 - 12_Lead Schedules_Exist Depr		No
Schedule No. 6B	Revenue Detail	Excel	Schedules 1 - 12_Lead Schedules_Exist Depr		No
Schedule No. 7	General Tax Summary	Excel	Schedules 1 - 12_Lead Schedules_Exist Depr		No
Schedule No. 8	Excise and Income Tax Summary	Excel	Schedules 1 - 12_Lead Schedules_Exist Depr		No
Schedule No. 9	Income Statement under Present Rates & Proposed Rates	Excel	Schedules 1 - 12_Lead Schedules_Exist Depr		No
Schedule No. 10A	Cost of Capital Summary HBP	Excel	Schedules 1 - 12_Lead Schedules_Exist Depr		No
Schedule No. 10B	Cost of Capital Summary Annual Base Rate Reset	Excel	Schedules 1 - 12_Lead Schedules_Exist Depr		No
Schedule No. 11	Revenue Conversion Factor & Tax Gross Up Factor	Excel	Schedules 1 - 12_Lead Schedules_Exist Depr		No
Schedule No. 12	Carrying Costs and ARM Reconciliation Deferred Account Balance	Excel	Schedules 1 - 12_Lead Schedules_Exist Depr		No
ATTACHMENT NO. 1: UPDATED RATE BASE SCHEDULES					
Schedule No. 14	Depreciation Expense - Calculation of Depreciation and Amortization Expense based on HBP Utility Plant in Service	Excel	Schedule 14_Depreciation Expense_Exist Depr		No
Schedule No. 14.1	Per Book Depreciation and Amortization Expense recorded during the HBP	Excel	Schedule 14_Depreciation Expense_Exist Depr		No
Schedule No. 14.2	Calculation of Annualized Depreciation and Amortization Expense for the Annual Base Rate Reset based on the UPIS Balance at the end of the HBP	Excel	Schedule 14_Depreciation Expense_Exist Depr		No
ATTACHMENT NO. 1: UPDATED REVENUE SCHEDULES					
Schedule 22A	Annual Base Rate Reset Total Revenues by Rate Schedule and Special Contract	Excel	Schedule 22A, 22B and Rates_Exist DEPR		No
Schedule 22B	Annual Base Rate Reset Revenue Components by Rate Schedule and Special Contract	Excel	Schedule 22A, 22B and Rates_Exist DEPR		No
Schedule No. 26A	Allocated Cost of Service Study by Rate Schedule	Excel	Schedule 26A_Allocated Cost of Service Study_Exist Depr		No
Schedule No. 26A.1	Allocated Cost of Service by Function	Excel	Schedule 26A_Allocated Cost of Service Study_Exist Depr		No
Schedule No. 26A.2	Class Allocation Factors by Rate Schedule	Excel	Schedule 26A_Allocated Cost of Service Study_Exist Depr		No
Schedule No. 26A.3	Class Allocation Factors by Function	Excel	Schedule 26A_Allocated Cost of Service Study_Exist Depr		No
Schedule No. 26A.4	Labor Class Allocation	Excel	Schedule 26A_Allocated Cost of Service Study_Exist Depr		No
Schedule No. 26A.5	Labor by Function	Excel	Schedule 26A_Allocated Cost of Service Study_Exist Depr		No
ATTACHMENT NO. 1A: UPDATED PROPOSED MODIFIED LEAD SCHEDULES					
Proposed Modified ARM - Schedule No. 1	Results of Operations	Excel	Proposed Modified ARM - Schedules 1 - 12_Lead Schedules_Exist Depr		No
Proposed Modified ARM - Schedule No. 2	Rate Base	Excel	Proposed Modified ARM - Schedules 1 - 12_Lead Schedules_Exist Depr		No
Proposed Modified ARM - Schedule No. 3	Lead Lag Results	Excel	Proposed Modified ARM - Schedules 1 - 12_Lead Schedules_Exist Depr		No
Proposed Modified ARM - Schedule No. 4A	Working Capital Expense Lag for HBP	Excel	Proposed Modified ARM - Schedules 1 - 12_Lead Schedules_Exist Depr		No
Proposed Modified ARM - Schedule No. 4B	Working Capital Expense Lag for Annual Base Rate Reset	Excel	Proposed Modified ARM - Schedules 1 - 12_Lead Schedules_Exist Depr		No
Proposed Modified ARM - Schedule No. 5	O&M Expense Summary	Excel	Proposed Modified ARM - Schedules 1 - 12_Lead Schedules_Exist Depr		No
Proposed Modified ARM - Schedule No. 6A	Revenue Summary	Excel	Proposed Modified ARM - Schedules 1 - 12_Lead Schedules_Exist Depr		No
Proposed Modified ARM - Schedule No. 6B	Revenue Detail	Excel	Proposed Modified ARM - Schedules 1 - 12_Lead Schedules_Exist Depr		No
Proposed Modified ARM - Schedule No. 7	General Tax Summary	Excel	Proposed Modified ARM - Schedules 1 - 12_Lead Schedules_Exist Depr		No
Proposed Modified ARM - Schedule No. 8	Excise and Income Tax Summary	Excel	Proposed Modified ARM - Schedules 1 - 12_Lead Schedules_Exist Depr		No
Proposed Modified ARM - Schedule No. 9	Income Statement under Present Rates & Proposed Rates	Excel	Proposed Modified ARM - Schedules 1 - 12_Lead Schedules_Exist Depr		No
Proposed Modified ARM - Schedule No. 10A	Cost of Capital Summary HBP	Excel	Proposed Modified ARM - Schedules 1 - 12_Lead Schedules_Exist Depr		No
Proposed Modified ARM - Schedule No. 10B	Cost of Capital Summary Annual Base Rate Reset	Excel	Proposed Modified ARM - Schedules 1 - 12_Lead Schedules_Exist Depr		No
Proposed Modified ARM - Schedule No. 11	Revenue Conversion Factor & Tax Gross Up Factor	Excel	Proposed Modified ARM - Schedules 1 - 12_Lead Schedules_Exist Depr		No
Proposed Modified ARM - Schedule No. 12	Carrying Costs and ARM Reconciliation Deferred Account Balance	Excel	Proposed Modified ARM - Schedules 1 - 12_Lead Schedules_Exist Depr		No
ATTACHMENT NO. 1A: UPDATED PROPOSED MODIFIED REVENUE SCHEDULES					
Proposed Modified ARM - Schedule 22A	Annual Base Rate Reset Total Revenues by Rate Schedule and Special Contract	Excel	Proposed Modified ARM - Schedule 22A, 22B and Rates_Exist DEPR		No
Proposed Modified ARM - Schedule 22B	Annual Base Rate Reset Revenue Components by Rate Schedule and Special Contract	Excel	Proposed Modified ARM - Schedule 22A, 22B and Rates_Exist DEPR		No
Proposed Modified ARM - Schedule No. 24	Summary of Normalized Billing Determinants and Proposed Margin Revenues	Excel	Proposed Modified ARM - Schedule 24,25,26,28_Billing Determinants, Proposed Revenues & Rates, WNA Exist DEPR		No
Proposed Modified ARM - Schedule No. 25	Proof of Revenue at Proposed Rates	Excel	Proposed Modified ARM - Schedule 24,25,26,28_Billing Determinants, Proposed Revenues & Rates, WNA Exist DEPR		No
Proposed Modified ARM - Schedule No. 26	Revenue Changes by Rate Schedule	Excel	Proposed Modified ARM - Schedule 24,25,26,28_Billing Determinants, Proposed Revenues & Rates, WNA Exist DEPR		No
Proposed Modified ARM - Schedule No. 26.1	Summary of Revenues Change by Rate Schedule for the Annual Base Rate Reset	Excel	Proposed Modified ARM - Schedule 24,25,26,28_Billing Determinants, Proposed Revenues & Rates, WNA Exist DEPR		No
Proposed Modified ARM - Schedule No. 26.2	Margin Revenue Rate Design by Rate Schedule for the Annual Base Rate Reset	Excel	Proposed Modified ARM - Schedule 24,25,26,28_Billing Determinants, Proposed Revenues & Rates, WNA Exist DEPR		No
Proposed Modified ARM - Schedule No. 26.3	Revenue Rate Design by Rate Schedule for the Annual Base Rate Reset	Excel	Proposed Modified ARM - Schedule 24,25,26,28_Billing Determinants, Proposed Revenues & Rates, WNA Exist DEPR		No
Proposed Modified ARM - Schedule No. 26.4	Revenue Rate Design by Rate Schedule for the Annual Base Rate Reset	Excel	Proposed Modified ARM - Schedule 24,25,26,28_Billing Determinants, Proposed Revenues & Rates, WNA Exist DEPR		No
Proposed Modified ARM - Schedule No. 26.5	Computation of ARM Rider Rates	Excel	Proposed Modified ARM - Schedule 24,25,26,28_Billing Determinants, Proposed Revenues & Rates, WNA Exist DEPR		No
Proposed Modified ARM - Schedule No. 26A	Allocated Cost of Service Study by Rate Schedule	Excel	Proposed Modified ARM - Schedule 26A_Allocated Cost of Service Study_Exist Depr		No
Proposed Modified ARM - Schedule No. 26A.1	Allocated Cost of Service by Function	Excel	Proposed Modified ARM - Schedule 26A_Allocated Cost of Service Study_Exist Depr		No
Proposed Modified ARM - Schedule No. 26A.2	Class Allocation Factors by Rate Schedule	Excel	Proposed Modified ARM - Schedule 26A_Allocated Cost of Service Study_Exist Depr		No
Proposed Modified ARM - Schedule No. 26A.3	Class Allocation Factors by Function	Excel	Proposed Modified ARM - Schedule 26A_Allocated Cost of Service Study_Exist Depr		No
Proposed Modified ARM - Schedule No. 26A.4	Labor Class Allocation	Excel	Proposed Modified ARM - Schedule 26A_Allocated Cost of Service Study_Exist Depr		No
Proposed Modified ARM - Schedule No. 26A.5	Labor by Function	Excel	Proposed Modified ARM - Schedule 26A_Allocated Cost of Service Study_Exist Depr		No
Proposed Modified ARM - Schedule No. 28	Factors for Weather Normalization Adjustment (WNA)	Excel	Proposed Modified ARM - Schedule 24,25,26,28_Billing Determinants, Proposed Revenues & Rates, WNA Exist DEPR		No

**PIEDMONT NATURAL GAS COMPANY, INC.**  
**DOCKET NO. 24-00036**  
**CONSUMER ADVOCATE DIVISION'S FIRST INFORMAL DISCOVERY**  
**REQUEST**

**Date Issued: June 7, 2024**  
**Response Provided: June 10, 2024**

**ATTACHMENT NO. 1**  
**UPDATED ARM FILING SCHEDULES**

Attachments Provided in Native Format

**PIEDMONT NATURAL GAS COMPANY, INC.**  
**DOCKET NO. 24-00036**  
**CONSUMER ADVOCATE DIVISION'S FIRST INFORMAL DISCOVERY**  
**REQUEST**

**Date Issued: June 7, 2024**  
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**ATTACHMENT NO. 1A**  
**UPDATED PROPOSED MODIFIED ARM FILING**  
**SCHEDULES**

Attachments Provided In Native Format

**PIEDMONT NATURAL GAS COMPANY, INC.**  
**DOCKET NO. 24-00036**  
**CONSUMER ADVOCATE DIVISION'S FIRST INFORMAL DISCOVERY**  
**REQUEST**  
**Date Issued: June 7, 2024**  
**Response Provided: June 10, 2024**

**ATTACHMENT NO. 5**  
**UPDATED PROPOSED TARIFF CHANGES**

Rate Schedule	Description	PROPOSED Tariff Base Rate Per 2024 Annual ARM Filing	-----Cumulative PGA-----		-----Current ACA-----		Current IPA	ARM Rider Rates	Rate Case Rider <sup>2</sup>	Total Adj. Factor (Sum Col.2 thru Col.7)	Billing Rate <sup>3</sup> (Col.1 + Col.8)
		<1>	Demand	Commodity	Demand	Commodity					
			<2>	<3>	<4a>	<4b>	<5>	<6>	<7>	<8>	<9>
Residential	Monthly Charge-Nov.-Mar.	\$17.45									\$17.45
	Monthly Charge-Apr.-Oct.	\$13.45									\$13.45
	301 Nov.- Mar. per TH	0.70815	0.07577	0.33101	(0.01933)	(0.07851)	0.00898	0.08250	0.00101	0.40143	1.10958
	301 Apr.- Oct. per TH	0.58609	0.07577	0.33101	(0.01933)	(0.07851)	0.00898	0.08250	0.00101	0.40143	0.98752
Small General	Monthly Charge	\$44.00									\$44.00
	302 Nov.- Mar. per TH	0.70663	0.07577	0.33101	(0.01933)	(0.07851)	0.00898	0.06866	0.00085	0.38743	1.09406
	302 Apr.- Oct. per TH	0.59025	0.07577	0.33101	(0.01933)	(0.07851)	0.00898	0.06866	0.00085	0.38743	0.97768
Medium General	Monthly Charge	\$225.00									\$225.00
	352 Nov.- Mar. per TH	0.60175	0.07577	0.33101	(0.01933)	(0.07851)	0.00898	0.06866	0.00085	0.38743	0.98918
	352 Apr.- Oct. per TH	0.50264	0.07577	0.33101	(0.01933)	(0.07851)	0.00898	0.06866	0.00085	0.38743	0.89007
Motor Vehicle Fuel	Monthly Charge	varies by customer per their corresponding rate schedule									
	343 Nov.- Mar. per TH	varies by customer per their corresponding rate schedule									
	343 Apr.- Oct. per TH	varies by customer per their corresponding rate schedule									
303 Firm General Sales	Monthly Charge	\$800.00									\$800.00
	Demand Charge per TH	0.80000	0.82829		(0.18590)					0.64239	1.44239
	First 15,000 TH/TH	0.25115		0.33101		(0.07851)	0.00898	0.03169	0.00039	0.29356	0.54471
	Next 25,000 TH/TH	0.24149		0.33101		(0.07851)	0.00898	0.03169	0.00039	0.29356	0.53505
	Next 50,000 TH/TH	0.15753		0.33101		(0.07851)	0.00898	0.03169	0.00039	0.29356	0.45109
	Over 90,000 TH/TH	0.08400		0.33101		(0.07851)	0.00898	0.03169	0.00039	0.29356	0.37756
304 Interruptible General Sales	Monthly Charge	\$800.00									\$800.00
	First 15,000 TH/TH	0.17235		0.33101		(0.07851)	0.00898	0.00745	0.00009	0.26902	0.44137
	Next 25,000 TH/TH	0.16300		0.33101		(0.07851)	0.00898	0.00745	0.00009	0.26902	0.43202
	Next 50,000 TH/TH	0.10029		0.33101		(0.07851)	0.00898	0.00745	0.00009	0.26902	0.36931
	Over 90,000 TH/TH	0.04631		0.33101		(0.07851)	0.00898	0.00745	0.00009	0.26902	0.31533
313 Firm Transportation	Monthly Charge	\$800.00									\$800.00
	Demand Charge per TH	0.80000	0.82829		(0.18590)					0.64239	1.44239
	First 15,000 TH/TH	0.25115						0.03169	0.00039	0.03208	0.28323
	Next 25,000 TH/TH	0.24149						0.03169	0.00039	0.03208	0.27357
	Next 50,000 TH/TH	0.15753						0.03169	0.00039	0.03208	0.18961
	Over 90,000 TH/TH	0.08400						0.03169	0.00039	0.03208	0.11608
314 Interruptible Transportation	Monthly Charge	\$800.00									\$800.00
	First 15,000 TH/TH	0.17235						0.00745	0.00009	0.00754	0.17989
	Next 25,000 TH/TH	0.16300						0.00745	0.00009	0.00754	0.17054
	Next 50,000 TH/TH	0.10029						0.00745	0.00009	0.00754	0.10783
	Over 90,000 TH/TH	0.04631						0.00745	0.00009	0.00754	0.05385
310 Resale Service	Demand Charge per TH	0.80000	0.82829		(0.18590)					0.64239	1.44239
	Commodity Charge	0.49063		0.33101		(0.07851)	0.00898	0.03169	0.00039	0.29356	0.78419

NOTES:

1/ Rates effective for bills rendered on and after the first billing cycle of October 2024

2/ Rate Case Rider rates as approved by the Tennessee Public Utility Commission in the March 21, 2022 Hearing in Docket No. 20-00086. These Rider rates are effective beginning April 1, 2022, and terminate at the earlier of April 1, 2025 or when the approved rider amount has been fully recovered.

3/ In accordance with the Tennessee Public Service Commission order in Docket U-7074 customers metered inside Davidson County are required to pay an additional 6.59% for collection of the Metro Franchise Fee. Customers served by the Ashland City, Fairview, Franklin, Greenbrier, Hartsville, Mt. Juliet and White House systems are required to pay 5.0%. Customers served by the Nolensville system are required to pay 3%.



Piedmont Natural Gas Company, Inc  
2024 ARM Annual Filing  
Comparison of Present and Proposed Rates\_Exist Depr Rates

Rate Schedule	Description	Present Total Billing Revenue Rates <sup>1</sup> <1>	Change in Revenue Rates <2>	Proposed Total Billing Revenue Rates <sup>2</sup> <3>
Residential 301 301	Monthly Charge-Nov.-Mar.	\$17.45	-	\$17.45
	Monthly Charge-Apr.-Oct.	\$13.45	-	\$13.45
	Nov.- Mar. per TH	0.68231	\$0.42727	1.10958
	Apr.- Oct. per TH	0.56470	\$0.42282	0.98752
Small General 302 302	Monthly Charge	\$44.00	-	\$44.00
	Nov.- Mar. per TH	0.68353	\$0.41053	1.09406
	Apr.- Oct. per TH	0.57095	\$0.40673	0.97768
Medium General 352 352	Monthly Charge	\$225.00	-	\$225.00
	Nov.- Mar. per TH	0.58398	\$0.40520	0.98918
	Apr.- Oct. per TH	0.48780	\$0.40227	0.89007
Motor Vehicle Fuel 343 343	Monthly Charge	varies by customer per their corresponding rate schedule		
	Nov.- Mar. per TH	varies by customer per their corresponding rate schedule		
	Apr.- Oct. per TH	varies by customer per their corresponding rate schedule		
303 Firm General Sales	Monthly Charge	\$800.00	-	\$800.00
	Demand Charge per TH	0.80000	0.64	1.44239
	First 15,000 TH/TH	0.24500	\$0.29971	0.54471
	Next 25,000 TH/TH	0.22050	\$0.31455	0.53505
	Next 50,000 TH/TH	0.15100	\$0.30009	0.45109
	Over 90,000 TH/TH	0.11300	\$0.26456	0.37756
304 Interruptible General Sales	Monthly Charge	\$800.00	-	\$800.00
	First 15,000 TH/TH	0.17000	\$0.27137	0.44137
	Next 25,000 TH/TH	0.14200	\$0.29002	0.43202
	Next 50,000 TH/TH	0.10927	\$0.26004	0.36931
	Over 90,000 TH/TH	0.04500	\$0.27033	0.31533
313 Firm Transportation	Monthly Charge	\$800.00	-	\$800.00
	Demand Charge per TH	0.80000	\$0.64239	1.44239
	First 15,000 TH/TH	0.24500	\$0.03823	0.28323
	Next 25,000 TH/TH	0.22050	\$0.05307	0.27357
	Next 50,000 TH/TH	0.15100	\$0.03861	0.18961
	Over 90,000 TH/TH	0.11300	\$0.00308	0.11608
314 Interruptible Transportation	Monthly Charge	\$800.00	-	\$800.00
	First 15,000 TH/TH	0.17000	\$0.00989	0.17989
	Next 25,000 TH/TH	0.14200	\$0.02854	0.17054
	Next 50,000 TH/TH	0.10927	(\$0.00144)	0.10783
	Over 90,000 TH/TH	0.04500	\$0.00885	0.05385
310 Resale Service	Demand Charge per TH	0.80000	0.64	1.44239
	Commodity Charge	0.49063	\$0.29356	0.78419

Footnotes:

1/ Total Billing Revenue Rates effective for bills rendered on and after the first billing cycle of May 2024 as reflected on the Eighty-Seventh Revised Sheet No. 1.

2/ Total Proposed Billing Revenue Rates effective for bills rendered on and after the first billing cycle of October 2024 as reflected on the Eighty-Eighth Revised Sheet No. 1 enclosed with Piedmont's 2024 ARM Annual Filing.

**PIEDMONT NATURAL GAS COMPANY, INC.**  
**DOCKET NO. 24-00036**  
**CONSUMER ADVOCATE DIVISION'S FIRST INFORMAL DISCOVERY**  
**REQUEST**  
**Date Issued: June 7, 2024**  
**Response Provided: June 10, 2024**

**ATTACHMENT NO. 5A**  
**UPDATED PROPOSED MODIFIED TARIFF CHANGES**

Rate Schedule	Description	PROPOSED	-----Cumulative PGA-----		-----Current ACA-----		Current IPA	ARM Rider Rates	Rate Case Rider <sup>2</sup>	Total Adj. Factor (Sum Col.2 thru Col.7)	Billing Rate <sup>3</sup> (Col.1 + Col.8)		
		Tariff											
		Base Rate Per 2024 Annual ARM Filing	Demand	Commodity	Demand	Commodity							
		<1>	<2>	<3>	<4a>	<4b>						<5>	<6>
Residential 301 301	Monthly Charge-Nov.-Mar.	\$17.45									\$17.45		
	Monthly Charge-Apr.-Oct.	\$13.45									\$13.45		
	Nov.- Mar. per TH	0.70782	0.07577	0.33101	(0.01933)	(0.07851)	0.00898	0.06568	0.00101	0.38461	1.09243		
	Apr.- Oct. per TH	0.58581	0.07577	0.33101	(0.01933)	(0.07851)	0.00898	0.06568	0.00101	0.38461	0.97042		
Small General 302 302	Monthly Charge	\$44.00									\$44.00		
	Nov.- Mar. per TH	0.70634	0.07577	0.33101	(0.01933)	(0.07851)	0.00898	0.05467	0.00085	0.37344	1.07978		
	Apr.- Oct. per TH	0.59000	0.07577	0.33101	(0.01933)	(0.07851)	0.00898	0.05467	0.00085	0.37344	0.96344		
Medium General 352 352	Monthly Charge	\$225.00									\$225.00		
	Nov.- Mar. per TH	0.60152	0.07577	0.33101	(0.01933)	(0.07851)	0.00898	0.05467	0.00085	0.37344	0.97496		
	Apr.- Oct. per TH	0.50245	0.07577	0.33101	(0.01933)	(0.07851)	0.00898	0.05467	0.00085	0.37344	0.87589		
Motor Vehicle Fuel 343 343	Monthly Charge	varies by customer per their corresponding rate schedule											
	Nov.- Mar. per TH	varies by customer per their corresponding rate schedule											
	Apr.- Oct. per TH	varies by customer per their corresponding rate schedule											
303 Firm General Sales	Monthly Charge	\$800.00									\$800.00		
	Demand Charge per TH	0.80000	0.82829		(0.18590)					0.64239	1.44239		
	First 15,000 TH/TH	0.25090		0.33101	(0.07851)	0.00898	0.02523	0.00039	0.28710	0.53800			
	Next 25,000 TH/TH	0.24150		0.33101	(0.07851)	0.00898	0.02523	0.00039	0.28710	0.52860			
	Next 50,000 TH/TH	0.15904		0.33101	(0.07851)	0.00898	0.02523	0.00039	0.28710	0.44614			
	Over 90,000 TH/TH	0.08045		0.33101	(0.07851)	0.00898	0.02523	0.00039	0.28710	0.36755			
304 Interruptible General Sales	Monthly Charge	\$800.00									\$800.00		
	First 15,000 TH/TH	0.17224		0.33101	(0.07851)	0.00898	0.00593	0.00009	0.26750	0.43974			
	Next 25,000 TH/TH	0.16299		0.33101	(0.07851)	0.00898	0.00593	0.00009	0.26750	0.43049			
	Next 50,000 TH/TH	0.10041		0.33101	(0.07851)	0.00898	0.00593	0.00009	0.26750	0.36791			
	Over 90,000 TH/TH	0.04626		0.33101	(0.07851)	0.00898	0.00593	0.00009	0.26750	0.31376			
313 Firm Transportation	Monthly Charge	\$800.00									\$800.00		
	Demand Charge per TH	0.80000	0.82829		(0.18590)					0.64239	1.44239		
	First 15,000 TH/TH	0.25090					0.02523	0.00039	0.02562	0.27652			
	Next 25,000 TH/TH	0.24150					0.02523	0.00039	0.02562	0.26712			
	Next 50,000 TH/TH	0.15904					0.02523	0.00039	0.02562	0.18466			
	Over 90,000 TH/TH	0.08045					0.02523	0.00039	0.02562	0.10607			
314 Interruptible Transportation	Monthly Charge	\$800.00									\$800.00		
	First 15,000 TH/TH	0.17224					0.00593	0.00009	0.00602	0.17826			
	Next 25,000 TH/TH	0.16299					0.00593	0.00009	0.00602	0.16901			
	Next 50,000 TH/TH	0.10041					0.00593	0.00009	0.00602	0.10643			
	Over 90,000 TH/TH	0.04626					0.00593	0.00009	0.00602	0.05228			
310 Resale Service	Demand Charge per TH	0.80000	0.82829		(0.18590)					0.64239	1.44239		
	Commodity Charge	0.49063		0.33101	(0.07851)	0.00898	0.02523	0.00039	0.28710	0.77773			

NOTES:

1/ Rates effective for bills rendered on and after the first billing cycle of October 2024

2/ Rate Case Rider rates as approved by the Tennessee Public Utility Commission in the March 21, 2022 Hearing in Docket No. 20-00086. These Rider rates are effective beginning April 1, 2022, and terminate at the earlier of April 1, 2025 or when the approved rider amount has been fully recovered.

3/ In accordance with the Tennessee Public Service Commission order in Docket U-7074 customers metered inside Davidson County are required to pay an additional 6.59% for collection of the Metro Franchise Fee. Customers served by the Ashland City, Fairview, Franklin, Greenbrier, Hartsville, Mt. Juliet and White House systems are required to pay 5.0%. Customers served by the Nolensville system are required to pay 3%.

Piedmont Natural Gas Company, Inc  
2024 ARM Annual Filing  
Comparison of Present and Proposed Rates\_Exist Depr Rates

Rate Schedule	Description	Present Total Billing Revenue Rates <sup>1</sup> <1>	Change in Revenue Rates <2>	Proposed Total Billing Revenue Rates <sup>2</sup> <3>
Residential 301 301	Monthly Charge-Nov.-Mar.	\$17.45	-	\$17.45
	Monthly Charge-Apr.-Oct.	\$13.45	-	\$13.45
	Nov.- Mar. per TH	0.68231	\$0.41012	1.09243
	Apr.- Oct. per TH	0.56470	\$0.40572	0.97042
Small General 302 302	Monthly Charge	\$44.00	-	\$44.00
	Nov.- Mar. per TH	0.68353	\$0.39625	1.07978
	Apr.- Oct. per TH	0.57095	\$0.39249	0.96344
Medium General 352 352	Monthly Charge	\$225.00	-	\$225.00
	Nov.- Mar. per TH	0.58398	\$0.39098	0.97496
	Apr.- Oct. per TH	0.48780	\$0.38809	0.87589
Motor Vehicle Fuel 343 343	Monthly Charge	varies by customer per their corresponding rate schedule		
	Nov.- Mar. per TH	varies by customer per their corresponding rate schedule		
	Apr.- Oct. per TH	varies by customer per their corresponding rate schedule		
303 Firm General Sales	Monthly Charge	\$800.00	-	\$800.00
	Demand Charge per TH	0.80000	0.64	1.44239
	First 15,000 TH/TH	0.24500	\$0.29300	0.53800
	Next 25,000 TH/TH	0.22050	\$0.30810	0.52860
	Next 50,000 TH/TH	0.15100	\$0.29514	0.44614
	Over 90,000 TH/TH	0.11300	\$0.25455	0.36755
304 Interruptible General Sales	Monthly Charge	\$800.00	-	\$800.00
	First 15,000 TH/TH	0.17000	\$0.26974	0.43974
	Next 25,000 TH/TH	0.14200	\$0.28849	0.43049
	Next 50,000 TH/TH	0.10927	\$0.25864	0.36791
	Over 90,000 TH/TH	0.04500	\$0.26876	0.31376
313 Firm Transportation	Monthly Charge	\$800.00	-	\$800.00
	Demand Charge per TH	0.80000	\$0.64239	1.44239
	First 15,000 TH/TH	0.24500	\$0.03152	0.27652
	Next 25,000 TH/TH	0.22050	\$0.04662	0.26712
	Next 50,000 TH/TH	0.15100	\$0.03366	0.18466
	Over 90,000 TH/TH	0.11300	(\$0.00693)	0.10607
314 Interruptible Transportation	Monthly Charge	\$800.00	-	\$800.00
	First 15,000 TH/TH	0.17000	\$0.00826	0.17826
	Next 25,000 TH/TH	0.14200	\$0.02701	0.16901
	Next 50,000 TH/TH	0.10927	(\$0.00284)	0.10643
	Over 90,000 TH/TH	0.04500	\$0.00728	0.05228
310 Resale Service	Demand Charge per TH	0.80000	0.64	1.44239
	Commodity Charge	0.49063	\$0.28710	0.77773

Footnotes:

1/ Total Billing Revenue Rates effective for bills rendered on and after the first billing cycle of May 2024 as reflected on the Eighty-Seventh Revised Sheet No. 1.

2/ Total Proposed Billing Revenue Rates effective for bills rendered on and after the first billing cycle of October 2024 as reflected on the Eighty-Eighth Revised Sheet No. 1 enclosed with Piedmont's 2024 ARM Annual Filing.