

**IN THE TENNESSEE PUBLIC UTILITY COMMISSION
AT NASHVILLE, TENNESSEE**

IN RE:

**PETITION OF PIEDMONT NATURAL
GAS COMPANY, INC. FOR APPROVAL
OF ITS 2025 ANNUAL REVIEW OF
RATES MECHANISM PURSUANT TO
TENN. CODE ANN. § 65-5-103(d)(6)**

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DOCKET NO. 25-00036

PETITION TO INTERVENE

The Consumer Advocate Division of the Office of the Attorney General (“Consumer Advocate”), by and through Jonathan Skrmetti, Attorney General and Reporter for the State of Tennessee, pursuant to Tenn. Code Ann. § 65-4-118, respectfully petitions the Tennessee Public Utility Commission (“TPUC” or the “Commission”) to grant the Consumer Advocate’s intervention into this proceeding because consumers’ interests, rights, duties, or privileges may be determined or affected by the *Petition of Piedmont Natural Gas Company, Inc. for Approval of Its 2025 Annual Review of Rates Mechanism Pursuant to Tenn. Code Ann. §65-5-103(d)(6)* filed by Piedmont Natural Gas Company, Inc. (“Piedmont” or the “Company”). The Consumer Advocate would show as follows:

1. The Consumer Advocate is authorized by Tenn. Code Ann. § 65-4-118 to represent the interests of Tennessee consumers of public utility services by initiating and intervening as a party in proceedings before the Commission in accordance with the Uniform Administrative Procedures Act and Commission rules.

2. Piedmont is a public utility incorporated under the laws of North Carolina, regulated by the Commission, and engaged in the business of providing natural gas service to

residential, commercial, and industrial customers in Tennessee. Piedmont's principal office in Tennessee is located at 83 Century Boulevard, Nashville, Tennessee.¹

3. In 2021, Piedmont filed a petition seeking to opt into the annual review mechanism ("ARM") procedure established under Tenn. Code Ann. § 65-5-103(d)(6).² In the 2021 petition, Piedmont requested TPUC's approval of an ARM based on the Company's meeting two statutory preconditions: (1) the Company's engagement in a general rate case within the last five years; and (2) the Company's filing for an ARM based on the methodologies it alleged were adopted in its most recent rate case.³ The Consumer Advocate was an intervenor in the 2021 docket.

4. The Company's first annual ARM filing was TPUC Docket No. 23-00035.⁴ The Consumer Advocate was also an intervenor in that docket.

5. The present Docket is the Company's third annual ARM filing. The Company seeks: (1) a rate increase to recover Historic Base Period ("HBP") Revenue Requirement Deficiency⁵ of approximately \$93,330 plus carrying costs. When adjusted for carrying costs utilizing the Net of Tax Overall Cost of Capital rate, plus the projected remaining ARM Deferred Account Balance at September 30, 2024, it totals \$1,943,876 to be collected from customers;⁶ and (2) an increase of \$8,679,258 to Base Margin Rates. This represents Annual Base Rate Reset Revenue Requirement Deficiency. This will result in an estimated \$2.38 increase per monthly

¹ *Petition of Piedmont Natural Gas Company, Inc. for Approval of Service Schedule No. 319 to Its Tennessee Service Regulations*, 1-2, TPUC Docket No. 22-00130 (November 29, 2022).

² *Petition of Piedmont Natural Gas Company, Inc. to Adopt an Annual Review of Rates Mechanism Pursuant to Tenn. Code Ann. § 65-5-103(d)(6)*, TPUC Docket No. 21-00135 (Nov. 05, 2021).

³ *Id.* at 4.

⁴ *Petition of Piedmont Natural Gas Company, Inc. for Approval of Its 2025 Annual Review of Rates Mechanism Pursuant to Tenn. Code Ann. § 65-5-103(d)(6)*, TPUC Docket No. 23-00035 (May 19, 2023).

⁵ *Direct Testimony of Conitsha B. Barnes* at 7:16-8:4, TPUC Docket No. 25-00036 (May 20, 2025).

⁶ *Direct Testimony of Keith Goley* at 5:12-21, TPUC Docket No. 25-00036 (May 20, 2025).

residential bill.⁷

6. In the instant matter, the Consumer Advocate seeks to represent the interests of consumers served by Piedmont.

7. The interests of consumers, including without limitation the proposed increase in rates to be paid by Piedmont's consumers, may be affected by determinations and orders made by the Commission with respect to: (1) the interpretation, application, and implementation of Tenn. Code Ann. § 65-5-103(d)(6), and other relevant statutory and regulatory provisions; (2) the review and analysis of the supporting schedules and other documentation, financial spreadsheets, and materials provided by Piedmont, and (3) the sufficiency and propriety of the Company's request in its petition.

8. Only by participating in this proceeding can the Consumer Advocate carry out its statutory duty to represent the interests of consumers.

WHEREFORE, the Consumer Advocate respectfully requests that the Commission grant this Petition to Intervene.

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⁷ The Consumer Advocate's estimation of a \$2.38/month increase for residential customers was calculated by dividing the revenue increase by the number of bills (revenue increase/number of bills). The revenue increase number comes from Schedule 26.1 which provides the Annual Base Rate Reset results in \$202,772,919 in revenues from the Residential Class and the Revenue Increase request is \$5,207,798 (2.6%). The number bills come from Schedule 24 which shows 2,216,103 residential customer bills for the period ending 12/30/2024.

RESPECTFULLY SUBMITTED,



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Consumer Advocate's Petition to Intervene

CERTIFICATE OF SERVICE

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

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This the 2nd day of June 2025.

SHILINA B. BROWN
Senior Assistant Attorney General