

STATE OF TENNESSEE

Office of the Attorney General



JONATHAN SKRMETTI
ATTORNEY GENERAL AND REPORTER

P.O. BOX 20207, NASHVILLE, TN 37202
TELEPHONE (615)741-3491
FACSIMILE (615)741-2009

November 4, 2025

Chairman David F. Jones
c/o Ectory Lawless, Docket Room Manager
Tennessee Public Utility Commission
502 Deadrick Street, 4th Floor
Nashville, TN 37243
Tpuc.docketroom@tn.gov

Electronically Filed in TPUC Docket
Room on November 4, 2025 at 3:24 p.m.

Re: *Application of Piedmont Natural Gas Company, Inc. and Spire Tennessee Inc. for Approval of a Transfer of Authority to Provide Utility Services Pursuant to T.C.A. § 65-4- 113 and Related Authorizations (TPUC Docket No. 25-00074)*

Dear Chairman Jones:

The Consumer Advocate submits this letter for correction and clarification of the issuance of two discovery requests in its second round of discovery to both Spire Tennessee, Inc. (“Spire”) and to Piedmont Natural Gas Company, Inc. (“Piedmont”).

The first correction is a request that upon discussion with the Parties should be redirected to Piedmont. The request is labeled DR 2-14 in the Spire requests issued on October 24, 2025. The Joint Applicants have been made aware of the inadvertent error and will reflect this change in their responses.

The corrections are attached as follows to Piedmont Tennessee:

2-19 Gas Supply. Refer to Data Vault documents Project-Level Capital Plan_ June 2025 -2.4.11.10 and TN Capital Spend 2022-2024 – 6.25.25 - 2.4.11.13 and the response provided in Spire’s Response to CA DR 1-7. Provide a breakdown of the capital expenditure forecast by the new business categories of: New Services; Commercial New Services; Pool Revenue Producing; Pool Revenue Producing – Off-Cycle; LNG Projects;

RNG Projects; and Total of Other Specific Projects. Also explain what would be included in both Pool Revenue Producing categories.

Further clarification was also discussed at the Parties' informal meeting on October 30, 2025 of Spire's discovery request labeled DR 2-5. The clarification is a restatement of the question in the inverse and is intended to only clarify what, if any, changes and by whom they were made to the model used in the due diligence process.

The clarification is restated as follows to Spire:

2-5 Due Diligence. Identify and explain any differences between the model and assumptions used by Duke in its analysis and the model and assumptions used by Spire in its evaluation supporting the bid to acquire the Piedmont-Tennessee service territory.

a. Provide copies and assumptions of all scenarios and cases that Spire conducted in its review.

Thank you for your time and consideration of this matter. If you have any questions, please contact me at (615) 360-4219.

Respectfully,



Victoria Glover
Assistant Attorney General

cc: All Parties of Record