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Room on February 3, 2026 at 2:19 p.m.

February 3, 2026

**VIA ELECTRONIC MAIL**  
**and Hand Delivery**

David F. Jones, Chairman  
c/o Ectory Lawless  
Tennessee Public Utility Commission  
502 Deaderick Street, Fourth Floor  
Nashville, Tennessee 37243

**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  
Docket No. 25-00074**

Dear Chairman Jones:

Enclosed for electronic filing with the Commission is Piedmont Natural Gas Company, Inc.'s and Spire Tennessee Inc.'s (collectively, the "Applicants") Motion for Leave for Substitution of Witness and Adopted Rebuttal Testimony of Renee Metzler.

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.

Thank you for your assistance with this matter. If you have any questions about this filing, you may reach me at the number shown above.

Sincerely,

  
Paul S. Davidson

PSD:jv  
Enclosures

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CERTIFICATE OF SERVICE

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

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This, the 3rd day of February, 2026.

/s/ Paul S. Davidson  
Paul S. Davidson

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

IN RE: )  
 )  
APPLICATION OF PIEDMONT NATURAL )  
GAS COMPANY, INC. AND SPIRE )  
TENNESSEE INC. FOR APPROVAL OF A ) **Docket No. 25-00074**  
TRANSFER OF AUTHORITY TO PROVIDE )  
UTILITY SERVICES PURSUANT TO T.C.A. )  
65-4-113 AND RELATED AUTHORIZATION )

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**APPLICANTS PIEDMONT NATURAL GAS COMPANY, INC.’S AND SPIRE  
TENNESSEE INC.’S MOTION FOR LEAVE FOR SUBSTITUTION OF  
WITNESS AND ADOPTION OF TESTIMONY**

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NOW COMES Piedmont Natural Gas Company, Inc. (“Piedmont”) and Spire Tennessee Inc. (“Spire Tennessee”) (collectively, “the Applicants”) by and through counsel, and hereby submit this motion to substitute Ms. Renee Metzler, Vice President of Total Rewards and Human Resources Operations for Duke Energy Corporation (“Duke Energy”), as the sponsor of the pre-filed rebuttal testimony of Mr. Andrew Etheridge, Director of Retirement for Duke Energy, in the above-captioned docket. In support of this motion, the Applicants show as follows:

1. Mr. Etheridge is unavailable to testify due to a long-standing family commitment that was previously scheduled well in advance of January 2025 when Mr. Etheridge learned he would be needed as a rebuttal witness in this proceeding.
2. Ms. Metzler was directly involved in the original preparation of Mr. Etheridge’s rebuttal testimony, is familiar with and agrees with its statements and conclusions, and has agreed to adopt Mr. Etheridge’s testimony, as filed, for purposes of the hearing in this matter.

3. Accordingly, the Applicants seek authorization to substitute Ms. Metzler for Mr. Etheridge at the hearing of this matter and for leave for Ms. Metzler to adopt Mr. Etheridge's pre-filed testimony.

4. The Applicants ask that the Commission accept the revised version of Mr. Etheridge's rebuttal testimony attached hereto in order to reflect Ms. Metzler's adoption thereof. *See* Exhibit A. This testimony is identical to Mr. Etheridge's original rebuttal testimony except as to the identification of the witness which has been changed to reflect the changed identity of the sponsoring witness.

5. Inasmuch as the adoption and revised testimony herein reflect no substantive changes to the Applicants' previously filed expert witness testimony, the Applicants submit that no party will be prejudiced by the relief requested herein.

6. The Applicants have contacted counsel for the Consumer Advocate Division of the Office of the Attorney General regarding this motion, and they have indicated they have no objection to the relief requested herein.

Respectfully submitted this 3rd day of February, 2026.

**Joint Counsel for Piedmont Natural Gas  
Company, Inc., Spire Inc., and Spire Tennessee  
Inc.**

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# **EXHIBIT A**

**Before the  
Tennessee Public Utility Commission**

**Docket No. 25-00074**

**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**

**Adopted Rebuttal Testimony  
of  
Renee Metzler**

**On Behalf Of  
Piedmont Natural Gas Company, Inc.**



January 9, 2026

1 **Q. Please state your name and business address.**

2 A. My name is Renee Metzler. My business address is 525 South Tryon Street,  
3 Charlotte, North Carolina 28202.

4 **Q. By whom and in what capacity are you employed?**

5 A. I am the Vice President, Total Rewards, and Human Resources (“HR”)  
6 Operations for Duke Energy Corporation (“Duke Energy”), the parent of  
7 Piedmont Natural Gas Company, Inc. (“Piedmont” or the “Company”). In  
8 this capacity, my responsibilities include the design and administration of  
9 Duke Energy’s retirement and health & insurance plans, as well as HR  
10 operations, including payroll, data analytics and HR products and systems.

11 **Q. Please describe your educational and professional background.**

12 A. I hold a Professional in Human Resources certification and received a  
13 Bachelor of Arts degree from the University of Mary Washington. I have  
14 been employed by Duke Energy for 24 years and have over 35 years’  
15 experience in benefits and HR. In my career, I have designed,  
16 implemented and managed a broad spectrum of employee benefit plans and  
17 HR systems and services.

18 **Q. Have you previously testified in this proceeding?**

19 A. No.

20 **Q. What is the purpose of your Rebuttal Testimony in this proceeding?**

21 A. The purpose of my Rebuttal Testimony in this proceeding is to respond to  
22 one of the matters raised in the Direct Testimony of David Dittmore filed  
23 in this docket on December 1, 2025, by the Consumer Advocate Division

1 of the Office of the Tennessee Attorney General (“Consumer Advocate”)  
2 concerning the Application of Piedmont Natural Gas Company, Inc. and  
3 Spire Tennessee Inc. for Approval of a Transfer of Authority to Provide  
4 Utility Services Pursuant to Tenn. Code Ann. § 65-4-113 and Related  
5 Authorizations (“Proposed Transaction” or “Transaction”), filed on  
6 September 8, 2025, in Tennessee Public Utility Commission (“TPUC”)  
7 Docket No. 25-00074. Specifically, my Rebuttal Testimony responds to  
8 Witness Dittmore’s recommendation on pension, marked as  
9 recommendation “I.” on page 6, lines 27 – 29 of his Direct Testimony,  
10 which states that “[t]he Commission should find that the existing Piedmont  
11 regulatory asset related to pensions should be written off and should not be  
12 transferred to the books of Spire based upon the terms of the Asset Purchase  
13 Agreement.”

14 **Q. Do you have any exhibits to your Rebuttal Testimony?**

15 A. No.

16 **Q. Can you summarize Witness Dittmore’s pension proposal?**

17 A. Yes. Witness Dittmore explains that his recommendations are intended to  
18 serve the purpose of “reflect[ing] the minimum guardrails necessary to  
19 protect customers from both the known and the potential negative  
20 implications of this transaction.”<sup>1</sup> Among all of the Tennessee-  
21 jurisdictional assets that Piedmont is selling to Spire, Inc. (“Spire”) pursuant  
22 to the Asset Purchase Agreement, Witness Dittmore appears singularly

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<sup>1</sup> Direct Testimony of David N. Dittmore, at p. 2, lines 16-17.

1       opposed to Piedmont’s plan to sell to Spire its long-standing pension  
2       regulatory asset account for Tennessee (“Pension Regulatory Asset”). The  
3       Pension Regulatory Asset account at issue contains the unamortized balance  
4       of the deferred pension costs previously incurred by Piedmont that the  
5       Commission has expressly authorized Piedmont to recover.<sup>2</sup> Simply put,  
6       Witness Dittmore’s recommendation is that Piedmont write-off the  
7       outstanding balance in its Pension Regulatory Asset account before the  
8       transaction occurs.<sup>3</sup>

9       **Q. Can you summarize Witness Dittmore’s rationale for his**  
10       **recommendation on pension?**

11       A. Yes, although I must note that there are multiple factually incorrect  
12       statements, unfounded speculation, and flawed conclusions utilized in  
13       Witness Dittmore’s apparent rationale for his recommendation, as laid out  
14       on pages 38 and 39 of his Direct Testimony. In summary, it appears to me  
15       that Witness Dittmore’s recommendation is premised upon uniformly  
16       incorrect notions that Piedmont’s “pension plan for qualifying legacy  
17       Piedmont employees is being terminated<sup>4</sup>” and that Piedmont can access  
18       and retain cash associated with its previous investments into the pension

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<sup>2</sup> The Commission’s *Order Approving Settlement Agreement Setting Rates and Approving the Procedures for Refunds to Customers* was issued on May 6, 2021 in Docket No. 20-00086. The *Stipulation and Settlement Agreement* was filed in that docket on February 3, 2021. As explained in paragraph 14.i. of the *Stipulation and Settlement Agreement*, Piedmont shall recover the entirety of its unamortized deferred pension expense balance at that time of \$11,862,981, through base rates over an eight-year period. Piedmont accordingly began such eight-year amortization of that balance through rates effective January 2, 2021. The approved eight-year amortization period concludes on January 1, 2029.

<sup>3</sup> Direct Testimony of David N. Dittmore, at p. 37, lines 21-22.

<sup>4</sup> *Id.*, at p. 38, lines 7-8.

1 plan,<sup>5</sup> as well as a flawed belief that his recommendation would protect  
2 against potential future cost increases after the closing of the transaction.<sup>6</sup>

3 **Q. How do you respond?**

4 A. I disagree with Witness Dittmore's recommendation because it is  
5 unfounded, unnecessary, and does not serve the public interest. In fact, if  
6 adopted by this Commission, Witness Dittmore's recommendation would  
7 produce the confiscatory result of preventing Piedmont from fully  
8 recovering the deferred pension investment costs that this Commission  
9 expressly authorized it to recover pursuant to the Commission's May 6,  
10 2021, *Order Approving Settlement Agreement Setting Rates and Approving*  
11 *the Procedures for Refunds to Customers* in Piedmont's last general ("2021  
12 Piedmont Rate Case Order") in Docket No. 20-00086.<sup>7</sup> Accordingly, I urge  
13 the Commission to reject Witness Dittmore's recommendation on pension.

14 **Q. Are you aware of any prior precedent for a state public utility**  
15 **commission ordering a utility to write-off a regulatory asset that the**  
16 **same commission properly authorized?**

17 A. No.

18 **Q. Would writing off Piedmont's Pension Regulatory Asset be consistent**  
19 **with the TPUC's prior rate orders?**

20 A. No. In fact, it would directly contradict many of the Commission's prior  
21 orders – most notably the Commission's 2021 Piedmont Rate Case Order.

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<sup>5</sup> *Id.*, at p. 38, lines 12-13.

<sup>6</sup> Direct Testimony of David N. Dittmore, at pp. 38-39, Q&A 59.

<sup>7</sup> See *supra* note 2.

1 **Q. Is Piedmont's pension plan about to be terminated, as Witness**  
2 **Dittemore contends?**

3 A. No. Duke Energy currently has no intention to terminate the Piedmont  
4 pension plan.<sup>8</sup>

5 **Q. Does Piedmont have any ability to access the investments that it**  
6 **previously made into the pension plan?**

7 A. No. Piedmont has no ability to access the investments that it previously  
8 made into the pension plan, nor any ability to access growth on those  
9 investments. Pursuant to federal law,<sup>9</sup> all of the pension plan investments  
10 (both the principal and the interest earned on the principal) are held in an  
11 irrevocable trust entirely for the pension plan participants. Accordingly,  
12 Witness Dittemore's contention that Piedmont "would retain the cash  
13 associated with an over-funded pension plan,"<sup>10</sup> is incorrect.

14 **Q. If the Commission were to adopt Witness Dittemore's pension**  
15 **recommendation, do you believe that action would (or could) impact**  
16 **retirement benefits that Spire provides to the employees that would**  
17 **support Spire Tennessee Inc.'s ("Spire Tennessee") utility operations?**

18 A. No, I do not believe so. Based on my experience as a retirement benefits  
19 professional and what I know of Spire Tennessee's plans for retirement  
20 benefit offerings to its forthcoming employees, I see no cause-and-effect

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<sup>8</sup> As background, Piedmont's pension plan benefit was closed to new participants effective January 1, 2008.

<sup>9</sup> The Employee Retirement Income Security Act of 1974 provides for the protection of pension benefits.

<sup>10</sup> Direct Testimony of David N. Dittemore, at p. 38, lines 12-13.

1 relationship between a write-off of the Piedmont Pension Regulatory Assets  
2 and the retirement benefits that Spire Tennessee would consider providing  
3 its forthcoming Tennessee employees. Accordingly, I see no realistic  
4 potential for a write-off of the Piedmont Pension Regulatory Assets to  
5 influence the level of costs that Spire Tennessee will incur.

6 **Q. Do you believe that Witness Dittmore's recommendation on pension**  
7 **provides any credible protection or safeguard to gas utility customers**  
8 **in Tennessee?**

9 A. No.

10 **Q. Does this conclude your pre-filed Rebuttal Testimony?**

11 A. Yes.