

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

IN RE:)	
)	
APPLICATION OF PIEDMONT)	
NATURAL GAS COMPANY, INC. AND)	DOCKET NO. 25-00074
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)	
)	

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 *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*. filed jointly by Piedmont Natural Gas Company, Inc. (“Piedmont”) and Spire Inc., (“Spire”) (collectively the “Applicants” or the “Companies”). 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 services to residential, commercial, and industrial customers in Tennessee. Piedmont’s principal office in Tennessee is located at 83 Century Boulevard, Nashville, Tennessee.¹

3. Spire is an investor-owned, publicly traded, natural gas utility holding company organized and existing under the laws of the State of Missouri. Its principal office is located at 700 Market Street, St. Louis, Missouri. Spire owns and operates, through various subsidiaries, natural gas public utilities in Missouri, Alabama, and Mississippi. Its operations are regulated, in various parts, by the Federal Energy Regulatory Commission (“FERC”) as well as the state public service commissions of the states identified above. In addition to its public utility operations, Spire also owns and operates several non-state regulated entities.²

4. Spire Tennessee is a wholly owned subsidiary of Spire, newly formed for the purpose of acquiring and operating the Piedmont utility assets in Tennessee.³

5. The present Docket is the Companies joint application for transfer of authority to provide public utility services pursuant to a separately executed asset purchase agreement.⁴ The Companies seek: (1) transfer of Piedmont’s authority to provide utility service in Tennessee to Spire Tennessee,⁵ and (2) certain related authorizations, including Spire Tennessee to adopt, on an interim basis, the existing approved Piedmont tariffs, rates, and regulatory mechanisms in effect as of the date of closing, pending any future proceedings before the Commission in which changes

¹ *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*, ¶3, TPUC Docket No. 25-00074 (September 8, 2025).

² *Id.* at ¶4.

³ *Id.* at ¶5.

⁴ *Id.* at ¶6.

⁵ *Id.* at 2.

or modifications to such tariffs, rates, and regulatory mechanisms could be addressed.⁶

6. In the instant matter, the Consumer Advocate seeks to represent the interests of consumers currently served by Piedmont and proposed to be served by Spire Tennessee.

7. The interests of consumers may be affected by determinations and orders made by the Commission with respect to: (a) the interpretation, application, and/or implementation of Tenn. Code Ann. §§ 65-4-113 and -5-103(d), as well as other relevant statutory and regulatory provisions; (b) the review and analysis of the documentation, financial spreadsheets, and materials provided by Piedmont; (c) the review and analysis of the documentation, financial spreadsheets, and materials provided by Spire; and (d) the interpretation, application, and/or implementation of the terms and conditions of the Commission's Orders in various TPUC dockets.

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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⁶ *Id.* at ¶13.

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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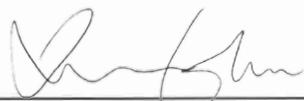
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This the 24 day of September 2025.



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