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May 4, 2000

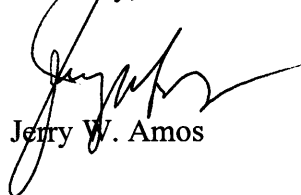
Mr. David Waddell
Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

Re: Docket No. 99-00994

Dear Mr. Waddell:

I am enclosing for filing six copies of the following responses to the Staff's Data Request #: 91, 102, 103, 117. Also included is one copy for the Associated Valley Industrial Group (AVIG).

Sincerely,



Jerry W. Amos

JWA:lh
Encl.

NASHVILLE GAS COMPANY
DOCKET NO. 99-00994
TENNESSEE REGULATORY AUTHORITY
STAFF DATA REQUEST # 1

91. Provide the underlying data sufficient to replicate the calculations explained in your response to number 2 in the previous year?

Response:

Excel format file sent electronically via email.

NASHVILLE GAS COMPANY
DOCKET NO. 99-00994
TENNESSEE REGULATORY AUTHORITY
STAFF DATA REQUEST # 1

102. In the testimony of Mr. Morris (page 12), you discuss a proposed change in the "Main Extension Policy." Provide a detailed explanation of the policy, compare the current policy to the proposed policy by showing examples of how the changes will affect each customer class. Provide the orders, and testimony or tariff provisions, approving the policies by the North Carolina Utilities

Response:

A detailed explanation of the proposed main extension policy is included in Section 5 of Exhibit ____ (BRM-2) of the prefiled Company testimony and exhibits. The enclosed schedules summarize a study performed by the Company in January 2000 to compare the actual approved IR's (Improvement Requisitions) for the 12 months ended October 31, 1999 with the IR's which would have been approved using the proposed net present value method for main extensions. Based on the results of that study, only 154 customers would not have produced the allowed rate of return of 9.85% under the NPV method out of a total of 7,003 customers approved during that period using the current ratio method of extending mains. This represents only a 2.20% difference from the total customer additions actually approved during fiscal year 1999.

No orders were issued by either the North Carolina Utilities Commission or the Public Service Commission of South Carolina specifically approving the Company's net present value of extending mains. Copies of the Company's approved service regulations for both states are included with this response which generally allows the Company to extend its mains where it is economically feasible to do so.

1/5/00

Nashville IRS (FY '99)

Manager Approved < 9.85% LOPROR

$$< 9.85\% = 103 \text{ customers} / 1852 = 5.6\%$$

Revenue Producing < 9.85% LOPROR

$$< 9.85\% = 51 \text{ customers} / 5151 = 1.0\%$$

Total mgr. Approved + Rev. Prod.

$$= 154 / 7003 = 2.20\%$$

EX '99
19.85% LOPROR

NASHVILLE

Project Number	NPV	Loprpr	Tenn Ratio	Mains Ratio	Investm Ratio	Residen Custom	Blanket Custom	Auth/38 Dollars	Revenue Ratio	Investment				Constru Factor	Residen Conver	Constru Factor	Constru New	Comme Factor	Comme Constr	Total Custom	Total Cost
										FACTO	Main Factors	Conver Factor	Ratio								
Manager Approved																					
00689	(1,933)	1.09	(2212)	8.34	9.86	1	628	3,454	414	1,242	414	1,242	414	0	414	0	0	0	0	1	4,082
00779	(2,358)	1.68	(3177)	9.62	10.93	1	628	4,617	480	1,440	480	1,440	480	0	480	0	0	0	0	1	5,245
09207	(1,845)	4.8	(929)	3.80	5.35	2	1,800	4,409	1,160	3,480	1,160	3,480	1,160	0	1,160	0	0	0	0	2	6,209
09185	(4,835)	5.8	36	2.99	5.54	7	8,400	9,834	3,290	9,870	3,290	9,870	3,290	0	3,290	0	0	0	0	7	18,234
09217	(1,003)	6	(756)	3.95	5.07	1	900	3,156	800	2,400	800	2,400	800	0	800	0	0	0	0	1	4,056
09109	(2,426)	7	124	2.95	4.61	3	4,200	7,466	2,530	7,590	2,530	7,590	2,530	0	2,530	0	0	0	0	3	11,666
09120	(839)	7.4	6	2.99	4.41	1	1,400	2,970	992	2,976	992	2,976	992	0	992	0	0	0	0	1	4,370
00025	(412)	7.78	54	2.89	4.15	1	628	1,437	497	1,491	497	1,491	497	0	497	0	0	0	0	1	2,065
00026	(1,058)	7.86	99	2.92	4.38	2	1,800	3,594	1,231	3,693	1,231	3,693	1,231	0	1,231	0	0	0	0	2	5,394
09161	(554)	8.1	38	2.95	4.12	1	900	2,269	769	2,307	769	2,307	769	0	769	0	0	0	0	1	3,169
09119	(494)	8.3	19	2.98	4.15	1	900	2,288	769	2,307	769	2,307	769	0	769	0	0	0	0	1	3,188
09230	(2,530)	8.4	35	2.99	4.07	5	4,500	12,451	4,162	12,486	4,162	12,486	4,162	0	4,162	0	0	0	0	5	16,951
09145	(4,389)	8.5	591	2.90	4.16	8	7,200	16,560	5,717	17,151	5,717	17,151	5,717	0	5,717	0	0	0	0	8	23,760
09196	(1,781)	8.5	125	2.95	3.93	3	2,700	8,206	2,777	8,331	2,777	8,331	2,777	0	2,777	0	0	0	0	3	10,906
09241	(947)	8.5	475	2.73	3.77	2	1,800	4,709	1,728	5,184	1,728	5,184	1,728	0	1,728	0	0	0	0	2	6,509
09154	(866)	8.6	197	2.87	4.04	2	1,800	4,417	1,538	4,614	1,538	4,614	1,538	0	1,538	0	0	0	0	2	6,217
09165	(450)	8.6	86	2.89	4.05	1	900	2,233	773	2,319	773	2,319	773	0	773	0	0	0	0	1	3,133
09183	(2,511)	8.6	591	2.85	4.66	5	7,000	10,974	3,855	11,565	3,855	11,565	3,855	0	3,855	0	0	0	0	5	17,974
09188	(632)	8.6	20	2.98	3.89	1	900	2,956	992	2,976	992	2,976	992	0	992	0	0	0	0	1	3,856
00051	(1,030)	8.64	22	2.99	3.84	1	1,398	4,874	1,632	4,896	1,632	4,896	1,632	0	1,632	0	0	0	0	1	6,272
09204	(965)	8.7	87	2.95	3.97	2	1,800	5,196	1,761	5,283	1,761	5,283	1,761	0	1,761	0	0	0	0	2	6,996
09214	(1,001)	8.7	178	2.90	3.91	2	1,800	5,198	1,792	5,376	1,792	5,376	1,792	0	1,792	0	0	0	0	2	6,998
09236	(659)	8.7	894	2.30	3.71	2	1,800	2,949	1,281	3,843	1,281	3,843	1,281	0	1,281	0	0	0	0	2	4,749
09117	(456)	8.8	202	2.75	3.87	1	900	2,198	800	2,400	800	2,400	800	0	800	0	0	0	0	1	3,098
09159	(6,252)	8.8	2819	2.69	4.06	9	12,600	24,763	9,194	27,582	9,194	27,582	9,194	0	9,194	0	0	0	0	9	37,363
09167	(911)	8.8	175	2.90	3.92	2	1,800	5,283	1,761	5,283	1,761	5,283	1,761	0	1,761	0	0	0	0	2	6,908
09250	(1,877)	8.8	138	2.94	4.10	3	2,700	6,876	2,338	7,014	2,338	7,014	2,338	0	2,338	0	0	0	0	3	9,576
00665	(375)	8.96	17	2.97	3.98	1	628	1,849	622	1,866	622	1,866	622	0	622	0	0	0	0	1	2,477
09200	(489)	9	48	2.95	3.83	1	900	3,021	1,023	3,069	1,023	3,069	1,023	0	1,023	0	0	0	0	1	3,921
09231	(1,174)	9.1	(3855)	2.67	3.84	3	2,700	6,166	2,311	2,311	2,311	0	0	0	0	0	0	2,311	2,311	3	8,866
00669	(386)	9.14	12	2.98	3.89	1	628	2,070	694	2,082	694	2,082	694	0	694	0	0	0	0	1	2,698
09112	(1,216)	9.3	1223	2.50	3.64	2	2,800	6,133	2,452	7,356	2,452	7,356	2,452	0	2,452	0	0	0	0	2	8,933
09127	(624)	9.4	1321	2.33	3.75	2	2,800	4,631	1,984	5,952	1,984	5,952	1,984	0	1,984	0	0	0	0	2	7,431
09110	(3,112)	9.5	4598	2.33	4.37	10	14,000	16,057	6,885	20,655	6,885	20,655	6,885	0	6,885	0	0	0	0	10	30,057
09218	(681)	9.5	525	2.70	3.72	2	1,800	4,758	1,761	5,283	1,761	5,283	1,761	0	1,761	0	0	0	0	2	6,558
09195	(508)	9.6	36	2.97	3.62	1	900	4,140	1,392	4,176	1,392	4,176	1,392	0	1,392	0	0	0	0	1	5,040
09197	(926)	9.6	1456	2.34	3.61	2	2,800	5,198	2,218	6,654	2,218	6,654	2,218	0	2,218	0	0	0	0	2	7,998
09130	(2,298)	9.8	61	1.99	3.67	8	11,201	13,295	6,678	13,356	6,678	13,356	6,678	0	6,678	0	6,678	0	0	8	24,496
										103	0	114,939	232,480								
										103	0	114,939	232,480								
09129	(927)	9.9	1018	2.63	3.61	3	2,700	7,274	2,764	8,292	2,764	8,292	2,764	0	2,764	0	0	0	0	3	9,974
09139	(402)	10	298	2.76	3.48	1	900	3,476	1,258	3,774	1,258	3,774	1,258	0	1,258	0	0	0	0	1	4,376
09234	(443)	10.1	884	2.44	3.58	2	1,800	3,823	1,569	4,707	1,569	4,707	1,569	0	1,569	0	0	0	0	2	6,823
09268	(531)	10.2	767	2.61	3.52	2	1,800	5,185	1,984	5,952	1,984	5,952	1,984	0	1,984	0	0	0	0	2	6,985
09263	(454)	10.28	8192	0.99	1.14	1	627	4,036	4,076	12,228	4,076	12,228	4,076	0	4,076	0	0	0	0	1	4,663
09118	(608)	10.4	1480	2.44	3.42	2	2,600	6,470	2,650	7,950	2,650	7,950	2,650	0	2,650	0	0	0	0	2	9,070
09128	4,995	10.5	1732	1.87	3.55	16	22,403	24,984	13,358	26,716	13,358	26,716	13,358	0	13,358	0	13,358	0	0	16	47,387
09164	(477)	10.5	859	2.61	3.42	2	1,800	5,795	2,218	6,654	2,218	6,654	2,218	0	2,218	0	0	0	0	2	7,595
09115	(985)	10.6	651	2.73	3.47	2	1,800	6,693	2,448	7,344	2,448	7,344	2,448	0	2,448	0	0	0	0	2	8,493
09265	(1,363)	10.6	(9914)	3.17	3.56	2	1,758	14,478	4,564	4,564	4,564	0	0	0	0	0	0	4,564	4,564	1	16,236
09133	(2,647)	10.9	67	1.96	3.40	2	2,401	3,273	1,670	3,340	1,670	3,340	1,670	0	1,670	0	0	0	0	2	5,674
09135	(2,047)	10.9	3043	2.52	4.06	7	9,800	15,998	6,347	19,041	6,347	19,041	6,347	0	6,347	0	0	0	0	7	25,798
09123	(2,113)	11	22403	0.94	2.38	76	30,401	20,021	21,212	42,424	21,212	42,424	21,212	0	21,212	0	21,212	0	0	76	50,422
09111	(2,080)	11.2	9513	1.63	3.45	9	12,600	11,250	6,921	20,763	6,921	20,763	6,921	0	6,921	0	0	0	0	9	23,850

5.67% of Total Cost

8.77% cost

MN EX T-2

[illegible]

FY'99
c 1.8576 LOPROR

NASHVILLE

Project Number	NPV	Loprpr	Tenn Ratio	Mains Ratio	Investm Ratio	Residen Custom	Comm/ Custom	Blanket Dollars	Auth/38 Dollars	Revenue Ratio	Investment				Constru Factor	New Constr Factor	Comm Factor	Total Custom	Total Cost
											FACTO	Main Factors	Conver Factor	Residen Conver					
Revenue Producing																			
00049	(1,074)	7.39	(4987)	5.65	5.65	17	1	0	4,987	882	0	882	0	0	27,460	13,730	0	882	1 4,987
00052	(8,674)	8.8	(12249)	2.89	4.07	43	18	16,200	39,709	13,730	27,460	13,730	0	0	42,340	21,170	0	32	18 55,909
00808	(10,787)	9.1	2796	1.87	3.98	50	32	44,803	39,544	21,170	42,340	21,170	0	0				51	32 84,347
								61,003	84,240										51 145,243
09818	(2,871)	10.7	(18948)	4.27	6.10	17		15,301	35,644	8,348	16,696	8,348	0	0	16,696	8,348	0	17	17 50,945
09825	(4,721)	10.8	(2151)	2.09	3.62	43		38,701	52,539	25,194	50,388	25,194	0	0	50,388	25,194	0	43	43 91,240
00676	(7,416)	11.72	27279	2.48	3.16	57		35,783	129,537	52,272	156,816	52,272	156,816	52,272				57	57 165,320
09848	(88)	12.1	15861	1.46	3.13	35		49,002	42,573	29,217	58,434	29,217	0	0	58,434	29,217	0	35	35 91,575
09806	266	12.2	6844	1.68	3.12	26		31,201	36,564	21,704	43,408	21,704	0	0	43,408	21,704	0	26	26 67,765
09868	779	12.3	6234	1.79	3.15	45		40,501	53,304	29,769	59,538	29,769	0	0	59,538	29,769	0	45	45 93,805
09802	3,481	13	24299	1.20	3.02	46		55,201	36,561	30,430	60,860	30,430	0	0	60,860	30,430	0	46	46 91,762
09816	(3,700)	13	225709	0.73	1.23	36		50,400	72,065	99,258	297,774	99,258	297,774	99,258	0	0	0	36	36 122,465
09826	3,458	13.1	3579	1.87	2.95	33		29,701	51,515	27,547	55,094	27,547	0	0	55,094	27,547	0	33	33 81,216
09857	6,138	13.2	16801	1.62	2.98	66		59,401	70,519	43,660	87,320	43,660	0	0	87,320	43,660	0	66	66 129,920
09873	4,738	13.5	5543	1.80	2.88	33		29,701	49,551	27,547	55,094	27,547	0	0	55,094	27,547	0	33	33 79,252
09856	6,188	14.1	13975	1.47	2.83	40		36,001	38,947	26,461	52,922	26,461	0	0	52,922	26,461	0	40	40 74,948
00639	6,471	14.32	(62392)	1.85	2.79	51		32,016	62,392	33,802	0	33,802	0	0	33,802	33,802	0	51	51 94,408
09866	2,903	14.4	(4201)	2.29	3.03	12		10,803	33,199	14,499	28,998	14,499	0	0	28,998	14,499	0	12	12 44,002
00032	15,786	14.52	(138652)	1.86	2.75	106		66,544	138,652	74,628	0	74,628	0	0	74,628	74,628	0	106	106 205,196
09804	6,128	14.6	2992	1.86	3.22	32		28,801	39,345	21,169	42,338	21,169	0	0	42,338	21,169	0	32	32 68,147
09835	3,879	14.9	2404	1.87	2.66	16		14,402	34,136	18,270	36,540	18,270	0	0	36,540	18,270	0	16	16 48,538
09861	16,463	14.9	27832	1.34	2.70	64		57,601	56,842	42,337	84,674	42,337	0	0	84,674	42,337	0	64	64 114,443
09820	11,641	15.1	17860	1.71	2.76	92		64,403	103,860	60,860	121,720	60,860	0	0	121,720	60,860	0	92	92 168,263
09846	7,877	15.1	16125	1.32	2.68	36		32,401	31,505	23,815	47,630	23,815	0	0	47,630	23,815	0	36	36 63,906
09845	14,001	15.2	47544	1.38	2.74	115		103,503	104,606	76,075	152,150	76,075	0	0	152,150	76,075	0	115	115 208,109
09860	5,681	15.4	15027	1.29	2.65	32		28,802	27,313	21,170	42,340	21,170	0	0	42,340	21,170	0	32	32 56,115
00048	7,407	15.47	(59909)	1.51	2.17	49		25,885	59,909	39,552	0	39,552	0	0	39,552	39,552	0	49	49 85,794
09847	7,906	15.5	16964	1.31	2.67	37		33,302	31,990	24,477	48,954	24,477	0	0	48,954	24,477	0	37	37 65,292
09847	7,906	15.5	(31990)	1.31	2.67	37		33,302	31,990	24,477	48,954	24,477	0	0	48,954	24,477	0	37	37 65,292
00027	6,142	15.6	(39535)	1.97	2.53	18		11,300	39,535	20,099	0	20,099	0	0	20,099	20,099	0	18	18 50,835
09867	9,916	15.7	19587	1.24	2.60	28		35,101	32,013	25,800	51,600	25,800	0	0	51,600	25,800	0	39	39 67,114
09859	9,964	16.2	13832	1.41	2.49	28		25,201	32,914	23,373	46,746	23,373	0	0	46,746	23,373	0	28	28 58,115
00033	14,528	16.25	(67762)	1.71	2.49	49		30,761	67,762	39,552	0	39,552	0	0	39,552	39,552	0	49	49 98,523
09803	(18,621)	16.4	2018	1.94	4.06	50		70,001	64,134	33,076	66,152	33,076	0	0	66,152	33,076	0	50	50 134,135
09813	44,256	16.4	162132	1.31	2.67	354		318,605	306,222	234,177	468,354	234,177	0	0	468,354	234,177	0	354	354 624,827
09844	18,492	16.4	25763	1.38	2.46	50		45,001	57,713	41,738	83,476	41,738	0	0	83,476	41,738	0	50	50 102,714
09807	38,235	16.5	126540	0.83	2.51	130		182,003	90,496	108,518	217,036	108,518	0	0	217,036	108,518	0	130	130 272,499
09811	57,841	17	163307	1.07	2.45	173		242,204	188,179	175,743	351,486	175,743	0	0	351,486	175,743	0	173	173 430,363
09843	15,097	17.1	22493	1.34	2.42	41		36,902	45,957	34,225	68,450	34,225	0	0	68,450	34,225	0	41	41 82,859
09801	45,039	17.2	100205	0.97	2.41	117		140,402	95,127	97,666	195,332	97,666	0	0	195,332	97,666	0	117	117 235,529
09828	20,908	17.5	15073	1.60	2.46	81		32,401	60,441	37,757	75,514	37,757	0	0	75,514	37,757	0	81	81 92,842
09852	19,045	17.5	21595	1.47	2.35	40		36,002	59,673	40,634	81,268	40,634	0	0	81,268	40,634	0	40	40 95,675
09805	16,301	17.9	41902	0.86	2.30	44		52,801	31,556	36,729	73,458	36,729	0	0	73,458	36,729	0	44	44 84,357
09834	12,067	18	9279	1.55	2.41	44		17,601	31,741	20,510	41,020	20,510	0	0	41,020	20,510	0	44	44 49,342
09865	11,685	18	13232	1.38	2.27	21		18,901	29,434	21,333	42,666	21,333	0	0	42,666	21,333	0	21	21 48,335
09871	25,427	18.4	36303	1.16	2.24	52		46,801	50,511	43,407	86,814	43,407	0	0	86,814	43,407	0	52	52 97,312
00609	19,638	18.56	(48417)	1.32	1.37	62		1,800	48,417	36,648	0	36,648	0	0	36,648	36,648	0	62	62 50,217
09837	31,074	18.6	35366	1.46	2.20	54		48,602	94,698	65,032	130,064	65,032	0	0	130,064	65,032	0	54	54 143,300
09830	21,863	19.3	47805	0.91	2.27	66		59,403	39,519	43,662	87,324	43,662	0	0	87,324	43,662	0	66	66 98,922
09842	20,363	19.8	38146	0.82	2.18	49		44,102	26,684	32,415	64,830	32,415	0	0	64,830	32,415	0	49	49 70,786
09814	27,202	20.2	39294	1.00	2.08	47		42,301	39,172	39,233	78,466	39,233	0	0	78,466	39,233	0	47	47 81,473
09815	51,761	20.6	110660	0.77	2.13	136		122,403	69,274	89,967	179,934	89,967	0	0	179,934	89,967	0	136	136 191,677
09869	39,181	21	75195	0.71	2.07	88		79,202	41,233	58,214	116,428	58,214	0	0	116,428	58,214	0	88	88 120,435

MN EXT-6

99% CUMULATIVE
TOT COST
1.5%

dependent upon the Company securing and retaining all necessary rights-of-way, privileges, franchises or permits, for the delivery of such service, and the Company shall not be liable to the customer for any failure to deliver service because of the Company's inability to secure or retain such rights-of-way, privileges, franchises or permits.

11. Access to Customer's Premises. The Company shall at all reasonable times have the right of ingress to and egress from the premises of the customer for any and all purposes connected with the delivery of service. The Company shall have the right, at its option and at its own expense, to place demand meters, pressure gauges, or other instruments on the premises of the customer for billing, testing, or other purposes with respect to the customer's service.

12. Installation and Maintenance of Facilities. The Company will install and maintain the necessary mains, gas service lines, valves, regulators, meters, over-pressure devices, indexes, gauges, and/or other equipment or facilities required to provide service. All facilities from the point of connection at the outlet of the meter assembly shall be installed and maintained by and at the expense of the customer. The Company may specify the content and pressure of the gas to be furnished, the location of the meter and the point where the service connection shall be made.

13. Installation Expenses. The facilities to be installed by the Company in accordance with the foregoing paragraph will be at no cost to the customer if (1) at a minimum the customer will be installing central gas heating, (2) the gas service line extends along the route selected by the Company and (3) the gas service line is no more than 100 feet. In the event that the above conditions are not met, the service rendered to the customer must provide a reasonable return to the Company. If the customer wishes the facilities to be constructed along a route other than the route selected by the Company and/or if the gas service line is more than 100 feet and/or the service to be rendered to the customer will not produce a reasonable return to the Company, the Company may require the customer to pay the excess cost of constructing the facilities along the alternate route or in excess of 100 feet and/or to make a contribution which will permit the Company to earn a reasonable return.

14. Relocation of Facilities. After a service connection has been made, it may be relocated on the customer's premises by the Company upon request of the customer, but the customer must bear the expense of the relocation, and the relocation will not be made where it will interfere with or jeopardize the Company's service either to the customer desiring the change or to any other customer or customers. The customer must also agree to change the location of the right-of-way and to bear the expense of the change. In no event, however, will the Company be



Piedmont
Natural Gas
Company

SOUTH CAROLINA PUBLIC SERVICE COMMISSION RULES AND REGULATIONS

APPENDIXES	Appendix D
Title: APPENDIX D - "SOUTH CAROLINA EXTENSION OF SERVICE POLICY" AS APPROVED BY THE COMMISSION	Effective Date: December 1, 1993
	Page 1 of 1 pages

South Carolina Extension of Service Policy

Piedmont's policy on the extension of service to new customers is as follows:

- I. For customers located on an existing gas main which has sufficient capacity to provide the service requested by the customer.

Piedmont will construct a service line for a distance of up to 100 feet and will construct the appurtenant metering and regulating equipment to serve a new customer on an existing gas main provided that the customer agrees to use gas for (1) at least one gas appliance excluding gas grills, gas logs, log lighters and unvented gas space heaters or (2) at least two of the above-mentioned gas appliances. If a customer does not agree to the conditions set forth in the foregoing sentence, Piedmont may nevertheless construct the additional facilities required to serve the customer if the customer agrees to make a sufficient contribution to the cost of construction as set forth in Section IV below.

- II. For customers not located on an existing gas main or located on existing main which does not have sufficient capacity to provide the service requested by the customer.

Piedmont is not obligated to construct a new gas main or to increase the capacity of an existing gas main to serve a new customer unless the revenue to be obtained from all new customers and from all increased sales of gas to existing customers will provide a return to Piedmont on the new facilities at least equal to Piedmont's overall cost of capital as established in its last general rate case. Notwithstanding the foregoing, Piedmont may construct the additional facilities if the customer agrees to make a sufficient contribution to the cost of construction as set for in Section IV below.

- III. For large industrial customers requiring substantial capital investment by Piedmont.

Notwithstanding the provisions of Sections I and II above, Piedmont may require large industrial customers to advance the cost of constructing new facilities where such costs are substantial, and Piedmont may negotiate a payback of any such advance based on the volume of gas used over a specified period of time.

- IV. Contributions in aid of construction.

A contribution in aid of construction will be deemed to be sufficient under the provisions of Sections I and II above if it will permit Piedmont to earn a return equal to its overall cost of capital as established in Piedmont's last general rate case. In computing return in connection with a contribution to the cost of construction, any taxes payable by Piedmont in connection with the contribution shall be taken into consideration.

JUL 19 1990

Charles B. Bell
EXECUTIVE DIRECTOR

NASHVILLE GAS COMPANY
DOCKET NO. 99-00994
TENNESSEE REGULATORY AUTHORITY
STAFF DATA REQUEST # 1

103. In the testimony of Mr. Morris (page 12), you propose to eliminate the preference given to Company employees under the existing main extension policy. Provide the additional revenue associated with eliminating this policy.

Response:

There would be no additional revenue realized by eliminating this policy. The Company assumes that the request is referring to additional contributions in aid of construction generated as a result of eliminating the employee preference rather than revenues. Since no contributions in aid of construction were provided by employees during the past five years, it is a safe assumption that no additional contributions in aid of construction would result after the employee preference is eliminated.

NASHVILLE GAS COMPANY
DOCKET NO. 99-00994
TENNESSEE REGULATORY AUTHORITY
STAFF DATA REQUEST # 1

117. On Company schedule IS-1, the Company reports per books test period amount of **\$13,642,959** for Salaries and Wages. Per the monthly financial reports sent to Staff and the Company's response to Staff's Data Request #85, the total test period Salaries and Wages are as follows. Please reconcile the two amounts.

Tennessee Direct Payroll	\$10,504,523	Monthly financials
TN Corp. Alloc. Payroll	\$3,309,638	Co. response to SR #85
Accrued Payroll Accounts	\$49,636	Monthly financials
Total	\$13,863,797	

Response:

The following is a breakdown of the \$13,642,959 salaries and wages expense reflected on Company worksheet IS-1.

Direct Tennessee Payroll	10,549,264
Account 995 (Undistributed Payroll)	58,704
Corporate Payroll Allocation	3,034,991
Total	13,642,959

Supporting schedules for the Direct Tennessee Payroll amount are attached. The amount used by the Company for Corporate Payroll Allocation for the test period is in error. The amount should have been \$3,309,638. It was incorrectly assumed that all corporate payroll allocations were posted to Account 920. As the Company's response to item #85 shows, other accounts contain corporate payroll allocations. Those accounts (Other than Account 920) which include corporate payroll allocations are overstated in the Company's attrition period expenses by the amount of the corporate payroll allocation times the appropriate growth factor. A schedule quantifying this overstatement of attrition expense in the amount of \$128,452 is attached. Since the attrition period Account 920 includes only long-term incentive plan expense, the error in corporate payroll amounts is of no consequence.

Nashville Gas Company
Payroll Charged to O&M Expenses
September 1998-August 1999

	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Total
84000	4022	4022	6033	4022	4022	4022	4022	4022	6033	4022	4182.84	4182.84	52607.68
84100	17648.94	16691.79	27249.44	18434	19098.19	17456.64	16638.84	17670.39	25586.59	17869.26	17619.61	17164.43	229328.12
84110				0.15				0.81					0.96
84400	8234.12	7693.59	11728.33	8088.78	8193.72	7081.3	7069.28	7760.47	11257.75	7559.24	7972.64	7737.48	100376.7
84800		144.88						130.08		135.07			410.03
84810	8211.32	7617.57	11744.53	8065.98	8159.52	7035.7	6977.12	7498.15	11234.95	7547.84	7987.84	7481.84	99562.36
84830				5.04									5.04
86310		141.92											141.92
87000	60916.01	61892.85	105355.2	59037.6	62915.99	58862.6	57010.31	58966.35	86471.22	59016.94	58891.86	59334.31	786671.24
87100	2236.66	2582.91	3223.33	2254.46	2284.86	2225.29	2193.2	2336.09	3321.21	2224.83	2297	2255.32	29435.16
87400	197.57	146.35	311.9	226.44	223.47	237.54	229.22	229.22	315.5	212.79	152.52	83.53	2566.05
87500	20436.36	22896.13	34082.13	23246.7	28344.16	23149.36	21249.86	21153.21	31431.4	22665.77	21645.79	21343.66	291644.53
87600			-1868.22			107.8				5.24			-1755.18
87810	1370.75	1137.17	2026.92	1067.54	1088.57	1633.3	1312.96	2071.2	3456.41	1477.44	2056.48	1228.58	19927.32
87815	10944.63	12306.25	13470.82	7194.67	5092.95	11443.05	8769.21	11664.59	13410.09	8764.02	10700.94	8278.57	122039.79
87825	6778.29	29862.52	104130.5	17564.63	13874.21	7246.66	7880.7	7442.09	9587.03	5736.86	4337.53	5234.64	219675.66
87827	20770.62	30804.38	48120.51	21115.83	24071.41	28296.08	26611.32	22950	36366.32	22965.97	19583.71	20057.98	321714.13
87828	18077.14	15895.35	21447.09	7630.42	6813.19	9321.45	3748.42	4741.7	5159.96	2832.04	3890.65	5841.5	105398.91
87830				53.22									53.22
87910	2158.02	2163.48	3236.75	2159.2	2158.98	2160.02	2266.53	2266.53	3400.07	2286.91	2284.49	2259.95	28760.93
87920	1365.98	319.32	1011.18	816.04	337.06	156.69	124.93	319.32	430.26	212.88	409.63	205.43	5708.72
87930	21371.91	19216.16	35220.77	26453.73	29684.67	21479.16	22547.92	24526.08	32897.46	23469.54	22693.09	22694.12	302354.61
87940	10754.99	14622.8	26239.39	13434.33	13217.25	12860.75	9967.72	10877.87	13343.19	8616.92	10053.35	10073.11	154061.67
87950													0
87970	83561.81	112458.81	187103.96	90420.53	99234.18	85534.48	82779.35	79740.29	117847.76	77353.05	82234.65	77321.55	1175590.42
88030	27067.38	26651.37	37019.96	26426.27	25110.89	21789.03	23502	23692.3	35137.09	23070.66	25339.32	24767	319573.27
88500													0
88600	2342.62	2419.97	3288.4	2121.3	2121.32	2187.85	2121.32	2121.32	3479.56	2227.38	2293.9	2808.34	29533.28
88700	49241.57	45185.01	90485.87	71498.72	64636.15	56179.63	65869.83	62515.97	89747.42	59512.29	60192.65	53705.05	768770.16
88701	535.41	1394.9	3280.11	2082.81	3314.8	1080.5	393.2	982.79	2058.41	2043.25	1842.3	597.86	19606.34
88702											408.03		408.03
88710	1749.18	2545.96	2126.19	1043.06	1443.93	1684.14	1489.43	901.75	1909.09	1186.74	1605.31	1621.76	19286.54
88720	46.14	62.36	68.35	120.58	48.97	52.06	50.23	192.15	76.18	51.38	44.19	30.72	843.31
88730	76.24	231.41	112.93	233.83	182.09	86.01	192.67	82.99	162.2	281.25	200.93	80.32	1922.87
88900	4588.37	5351.96	7509.09	5055.59	4800.26	5032	4922.32	5115.68	7192.47	5105.79	5312.61	5284.98	65271.12
89000									118.24				118.24
89200	41231.05	37487.45	56241.64	46454.23	43660.52	47255.1	47964.62	56807.73	75848.58	57733.81	53459.16	52242.92	616386.82
89201	1791.95	2477.23	2128.89	1097.68	1254.29	1967.71	1734.33	1821.34	2771.6	1340.56	703.68	2462.97	21552.23
89210	853	141.92	1311.07	547.38	827.84	847.08	745.82	869.26	2030.8	1206.32	851.52	1118.77	11350.78
89230											99.77		99.77
89310	32324.99	21664.1	31540.31	19505.79	20607.01	24958.95	34457.11	30062.27	46493.04	32024	30242.78	30278.68	354159.03
89315	786.22	63.99			208.56		394.35	35.13	396.72	50.26	48.79	26.61	2010.63
89320				2.5	0.38								2.88
90100	14512.71	11965.53	17719.91	11817.46	13459.33	15190.13	15310.97	15378.88	23068.1	15412.94	15440.62	15563.79	184840.37

Nashville Gas Company
Payroll Charged to O&M Expenses
September 1998-August 1999

	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Total
90200	50484.26	46033.69	70447	48512.9	51299.53	54335.35	52073.48	53639.58	75000.54	51041.52	44334.04	45630.24	643032.13
90205	425.76	283.84			39.92		461.24	780.56	1490.16	212.88			3694.36
90310	82541.4	84534.07	92568.71	57803.96	60640.43	58920.55	57094.39	57922.26	86338.13	62364.46	58627.87	57200.9	816557.13
90315	53.59	53.22	84.27	213.44	204.63	2210.38	745.45	266.1	133.3	128.62	115.31	117.13	4325.44
90320	16239.49	16165.31	40037.47	30465.79	28632.67	29642.53	27313.45	29789.66	44816.62	28407.15	30539.05	29641.81	351691
90321			7325.03	4541.6	4594.05	2032.77	2344.72	2054.77	3207.53	1810.28	1497.56	1430.38	30838.69
90330	38447.16	38789.61	71548.25	47892.92	47821	48038.63	49545.02	49394.07	74847.49	24517.2	25585.23	27443.71	543870.29
90900													0
91010	4239.04	4239.04	6500.15	4333.43	4333.44	4333.44	4351.02	4333.44	6695	4408.48	4408.47	4408.48	56583.43
91500	3758.03	3874.97	5630.76	3783.09	3778.39	3800.63	3787.48	3965.19	5944.12	3967.02	3915.19	3818.05	50022.92
91610	15860.78	15972.06	25339.03	17572.47	17173.58	16217.35	15863.26	16814.46	24684.1	16954.96	16954.96	17257.44	216684.45
91620	37075.28	38930.34	59560.61	41489.03	39045.25	38247.48	38233.45	40330.36	58884.57	39906.71	39965.8	39351.27	511020.15
91630	252.81	341.65	374.46	271.86	268.28	285.18	275.19	275.19	417.35	281.48	242.11	168.32	3453.88
91760			22.5	36.94		349.05	299.21	25.43	162.12	60.01			955.26
91810	2719.96		150.71	11.86		1.47		55.81				39.01	2978.82
92000	37220.4	53783.92	60923.25	41198.87	53638.89	40769	41147.91	50535.53	62758.68	41885.17	60111.12	42330.89	586503.63
92110	463.51	626.36	686.51	498.41	491.85	522.83	504.51	504.51	765.14	516.05	443.87	308.58	6332.13
92130										23136.02	23263.72	23517.94	69917.68
92610					10299.75	10299.75	9851.87	9851.87	9851.87	9934.78	9934.78	9934.78	79959.45
92630					3572.89	1973.5	873	873	4020.6	1620.15	3230.01		16163.15
92900	21.41	1684.93	376.9	336.25	4959.56	7290.53	6051.29	2686.71		129.33	255.29	676.28	24468.48
92905	3672	3852.92	4120.93			60.36			5301.08	787.92	3431.69	6710.19	27937.09
93230	2621.6	2479.76	4860.58	3204.72	3028.16	3860.13	3458.86	3884.2	5430.4	2340	1974.24	3136.21	40278.86
	772300.44	831905.08	1343257.37	801405.27	844512.99	800071.73	795001.89	814928.7	1172888.47	790611.43	805790.72	776589.99	10549264.08

NASHVILLE GAS COMPANY
TRA DATA REQUEST

Item 85
Corrected
4/11/00

Allocated Charges to Nashville Gas Company from Piedmont Natural Gas by account
for the 12 months ended August 31, 1999

Account	Total CO	Total CO Payroll	Account	Total CO	Total CO Payroll
80720			92205	(4,146)	
80750			92320	109,459	
80760			92330	59,822	
84010			92340	2,444,727	
85000	1,508	1,508 *	92400	48,211	
86100	1,508	1,508 *	92510	163,719	
86300	17		92515	314,143	
88020	(355)		92520	8,640	
88030	(58)		92610	614,857	
88700	113	110 *	92611	-	
89000	6,943	6,774 *	92615	10,501	
89200	614	80 *	92620	2,309,875	
89320	2		92625	573,998	
90310	3,978	3,005 *	92630	684	
90320	2,904	2,904 *	92640	37,493	697 *
90330	33,149	33,149 *	92800	2,259	
90350	23,646		92900	5,065	110 *
90360	(4)		93010	111,706	
90370	464,839		93020	135,174	
90500	-		93030	116,703	
91200	69,540		93040	1,886	
91620	61,145	59,889 *	93060	10,731	
91630	5,543		93080	20,132	
91710	2,865		93100	54,066	
91720	(74,489)		93210	9,317	6,946 *
91770	-		93220	12,768	
91790	250		93230	293,123	
91810	4,004	21 *	99512	341	341
92000	4,327,392	3,186,031	99520	8	8
92110	309,298		99521	(10)	(10)
92120	160,008		99531	(1,277)	(1,277)
92130	185,571		99540	(5,946)	(5,946)
92140	75,438		99550	(4,432)	(4,432)
92202	(40,086)	(465)	99560	20,462	20,462
92203	(90,424)	(593)	99561	(70)	(70)
92204	(231,241)	(1,111)			
			Total	12,777,603	3,309,638

108,948
* 1.1056
120,453

7,753
* 1.0317
7,999