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VIA ELECTRONIC FILINGMs. M. Lynn Jarvis
Chief Clerk
North Carolina Utilities Commission
430 N. Salisbury Street, Dobbs Building
Raleigh, North Carolina 27603**Re: Piedmont Natural Gas Company, Inc. Request for Extension to Submit Quarterly
Surveillance Reports Within 60 Days of Close of Quarter**

Dear Ms. Jarvis:

Piedmont Natural Gas Company, Inc. ("Piedmont") hereby respectfully requests a modification of the time in which it is required to submit its Quarterly Earnings Surveillance Reports (GS-1 Report) to the Commission from thirty (30) days after the close of the quarter to which the report applies to sixty (60) days after the close of the quarter to which the report applies. The basis for this requested modification set forth below.

In the Commission's September 29, 2016 *Order Approving Merger Subject To Regulatory Conditions And Code Of Conduct* in Docket No. G-9, Sub 682, the Commission ordered that upon the close of the merger Piedmont shall begin utilizing a revised NCUC GS-1 Earnings Surveillance Report format similar to the format of the ES-1 Earnings Surveillance Report that is submitted to the Commission by the electric utilities. The modification to the reporting deadline requested herein will allow Piedmont sufficient time to gather and process the additional data involved in the expanded report and is consistent with the deadline for the ES-1 Reports submitted by Duke Energy Carolinas and Duke Energy Progress.

Further, as a result of the closing of the merger identified above, Piedmont is now operating on a calendar year/calendar quarter basis. As a result, a thirty (30) day reporting requirement for GS-1 reports will result in the disclosure of material non-public financial information of Piedmont prior to the filing of the Duke Energy 10-Q/10-K for the same period. Piedmont believes that this is problematic for SEC reporting purposes but can be remedied by the modified deadline requested herein.

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

Sincerely,

/s/ James H. Jeffries IV
James H. Jeffries IV

JHJ/rkg

cc: Bruce Barkley
Pia Powers
Elizabeth Culpepper