

STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH

DOCKET NO. G-9, SUB 743

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

DOCKET NO. G-9, SUB 743)
)
In the Matter of) ATTORNEY GENERAL'S
Application of Piedmont Natural Gas Company,) DATA
Inc., for an Adjustment of Rates, Charges, and) SECOND REQUESTS TO
Tariffs Applicable to Service in North Carolina) PIEDMONT
Continuation of its IMR Mechanism, Adoption) REGARDING SETTLEMENT.
of an EDIT Rider, and Other Relief) 14 August 2019

Attorney General Joshua H. Stein, by and through the undersigned attorney, submits the following data request for information and documents concerning the proceeding in the above-referenced docket.

- The requests are continuing, and require supplemental responses as additional or different information is discovered after the initial responses to these data requests.
 - Please state the name and position of the person(s) providing each response.
- (1) Exhibit J to the Stipulation shows a comparison of the end of period revenues to stipulated proposed revenues for each customer class for year 1.
- Please provide a comparison of the end of period revenues to stipulated proposed revenues for each customer class as is done in Exhibit J for year 1, but provide the comparison for year 2, year 3, year 4, and year 5.
- (2) Please provide Exhibit J again, breaking out the amounts and percentages relating to the Excess Deferred Income Taxes in years 1-5.
- (3) Please state how customer rates would be impacted in Year 1 by the following changes to the agreements reflected in the Stipulation filed in this matter on August 12, 2019, and provide your workpapers:
- (a) If federal "unprotected EDIT" is returned to customers over three years instead of five years as reflected in the Stipulation [and corresponding adjustments are made, such as an adjustment to ratebase];
 - (b) If the allowed Return on Equity is 8.7%, instead of the 9.7% provided for in the Stipulation [including the impact on gross up]; and
 - (c) If both changes are made to the Stipulation.

Please provide the impact on rates (i) as a percentage increase in overall rates

compared to existing rates, and (ii) as the changes would impact the average bill of customers by class, both as a percentage and as a dollar amount.

- (4) Please provide Settlement Exhibit PKP-1 showing the impact of the change if the equity ratio in the capital structure changes from 52% to 50% and the percentage of long-term debt is increased to make up the balance in the capital structure.
- (5) Please provide Settlement Exhibit PKP-1 showing the impact of the change if the return on equity is not changed from 10.6% to 9.7% and the equity ratio stays 52%.
- (6) Please provide Settlement Exhibit PKP-1 showing the impact of the change if the return on equity is changed from the settlement 9.7% to 8.7% and the equity ratio stays 52%.

This the 14th day of August 2019.

/s/ _____
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