

June 26, 2024

VIA ELECTRONIC FILING

Ms. A. Shonta Dunston
Chief Clerk
North Carolina Utilities Commission
430 North Salisbury Street, Dobbs Building
Raleigh, NC 27603

Re: Docket No. G-9, Sub 837

Dear Ms. Dunston:

Enclosed for filing with the North Carolina Utilities Commission (“Commission”), please find the Objections of Piedmont Natural Gas Company, Inc. (“Piedmont”) to Nucor Steel-Hertford’s (“Nucor”) First Set of Data Requests that Nucor served on Piedmont in the above-captioned docket.

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,

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

JHJ/cm

Enclosures

cc: Parties of record

STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH

DOCKET NO. G-9, SUB 837

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of:)	
Application of Piedmont Natural Gas Company,)	
Inc., for an Adjustment of Rates, Charges, and)	OBJECTIONS OF PIEDMONT
Tariffs Applicable to Service in North Carolina,)	NATURAL GAS COMPANY, INC. TO
Continuation of its IMR Mechanism, Adoption)	NUCOR STEEL-HERTFORD'S
of New Depreciation Rates for its Utility)	FIRST SET OF DATA REQUESTS
Property, Regulatory Asset Accounting)	
Treatment for Certain Operating Expenses, and)	
Other Relief)	

Piedmont Natural Gas Company, Inc. (“Piedmont”), through counsel, respectfully submits the following general objections to Nucor Steel-Hertford’s (“Nucor”) First Set of Data Requests that Nucor served on Piedmont in the above-captioned docket.

Piedmont generally objects to Nucor’s First Set of Data Requests, and the definitions and instructions set forth therein, to the extent that such data requests:

1. Seek to create or impose discovery obligations that exceed the discovery obligations that would otherwise be applicable to Piedmont under the North Carolina Rules of Civil Procedure or that are imposed on Piedmont by any scheduling or other order the North Carolina Utilities Commission (“Commission”) has or may issue in this docket;
2. Seek to create or impose discovery obligations that would result in the affirmative creation, production, or collation of new data, analyses, or studies that are not currently in Piedmont’s possession;

3. Seek the production of materials prepared in anticipation of litigation or that are subject to the Attorney-Client or Attorney-Work Product privileges; and

4. Seek the production of confidential or proprietary information in the absence of an executed non-disclosure agreement between Piedmont and Nucor or protective order issued by the Commission.

Subject to the foregoing general objections, and other possible specific objections that may be applicable to future individual Nucor data requests, Piedmont will produce documents and information in its possession responsive to Nucor's First Set of Data Requests by providing access to such documents and information through a ShareFile link within 10 days of service.

A copy of Nucor's First Set of Data Requests to Piedmont Natural Gas Company, Inc. is attached hereto as Exhibit A.

WHEREFORE, Piedmont respectfully submits the foregoing General Objections to the First Set of Data Requests of Nucor in this proceeding.

Respectfully submitted, this the 26th day of June, 2024.

Piedmont Natural Gas Company, Inc.

/s/ James H. Jeffries IV

James H. Jeffries IV

Brian L. Franklin

McGuireWoods LLP

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**PIEDMONT NATURAL GAS COMPANY, INC.
DOCKET NO. G-9, SUB 837**

EXHIBIT A

**STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH**

DOCKET NO. G-9, SUB 837

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of Application of Piedmont)	
Natural Gas Company, Inc., for an)	
Adjustment of Rates, Charges, and Tariffs)	
Applicable to Service in North Carolina,)	NUCOR STEEL – HERTFORD’S
Continuation of its IMR Mechanism,)	FIRST SET OF DATA REQUESTS
Adoption of New Depreciation Rates for its)	TO PIEDMONT NATURAL GAS
Utility Property, Regulatory Asset)	COMPANY, INC.
Accounting Treatment for Certain)	
Operating Expenses, and Other Relief)	

INSTRUCTIONS

1. In answering each Request, please state the text of the Request prior to providing the response. Each Request and applicable response should be on a separate page. Where there are subparts to a Request, each subpart and applicable response should be on a separate page. Each Request is continuing in nature. Thus, if Piedmont acquires or discovers additional or different information with respect to a Request after the Request has been initially answered, Piedmont is required to supplement its response immediately following the receipt of such additional or different information, giving the additional or different information to the same extent as originally requested. Piedmont may not postpone serving such responsive supplemental information until after the filing of any testimony or supporting documents in this proceeding. Initial and supplementary responses shall be full, complete and accurate since they will be relied upon by Nucor for the purposes of this proceeding. For each Request, list all assumptions made by Piedmont in answering said Request.
2. In the event that Piedmont asserts that any of the information requested is deemed by it to be privileged or proprietary, then Piedmont in its written response should identify any such data, and any supporting documents, by date and general content. Piedmont should also identify all persons who participated in the preparation of the document and all persons, inside or outside Piedmont, who received a copy, read or examined any such documents. In addition, Piedmont should indicate its claim of privilege with particularity and describe the grounds upon which privilege is claimed. State the present location of the document and all copies thereof and identify each person having custody or control of the document and said copies.
3. To the extent that Piedmont asserts that any requested information is not relevant or not material to any issue in the above-captioned matter, Piedmont, in its written response hereto, should indicate a specific basis for said assertion in the context of any issues arising in this proceeding.

4. In the event Piedmont asserts that any requested information is not available in the form requested, Piedmont, in its written response thereto, should disclose the following:
 - (a) the form in which the requested data currently exists (identifying documents by title);
 - (b) whether it is possible under any circumstances for Piedmont to provide the data in the form requested;
 - (c) the procedures or calculation necessary to provide the data in the form requested;
 - (d) the length of time (in hours or days) necessary for Piedmont to prepare the data in the form requested; and
 - (e) the earliest dates, time period, and location that representatives of Nucor may inspect Piedmont's files, records or documents in which the requested information currently exists.
5. The Requests contained herein contemplate that individual copies of any documentary material requested will be provided to Nucor as is the usual custom in regulatory proceedings. In the event that Piedmont asserts that any requested documents are too voluminous, or, for some other reason, that copies cannot be provided, Piedmont is requested to make this documentary material available for inspection as of the date of the required written responses at the offices of Nelson Mullins Riley & Scarborough, LLP, 301 Hillsborough Street, Suite 1400, Raleigh, NC 27622, or at such other time and place as may be mutually agreed upon among counsel for the parties. Selective copying shall also be provided by Piedmont pursuant to Nucor's designation at that time.
6. In providing documents, Piedmont is requested to furnish all documents or items in its physical possession or custody, as well as those materials under the physical possession, custody or control of any other person acting or purporting to act on behalf of Piedmont or any of Piedmont's employees or representatives, whether as an agent, independent contractor, attorney, consultant, witness, or otherwise. If documents responsive to a request existed at one time but have been discarded, lost or destroyed, please describe by category such documents, state the identity of the person having knowledge of the circumstances of their discard, loss or destruction, and state the date on which such documents were discarded, lost or destroyed.
7. To the extent any requested document cannot be provided in full, it shall be provided to the extent possible, with an indication of what document or portion of what document is being withheld and the reasons for withholding said document.
8. Pursuant to Rule 34(b) of the North Carolina Rules of Civil Procedure, documents are to be produced as they are kept in the usual course of business. To the extent that they are attached to each other, documents should not be separated.
9. Documents not otherwise responsive to this Request shall be provided if such documents are attached to documents responsive to this Request, and constitute routing slips, transmittal memoranda, letters, comments, evaluations, or similar materials.
10. For each Request answered, provide the name of the person or persons answering, the title of such persons, and the name of the witness or witnesses who will be prepared to testify

concerning the matters contained in each response or document provided. Piedmont shall provide all responses under oath.

11. Unless otherwise indicated, the following Requests shall require you to furnish information and tangible materials pertaining to, in existence, or in effect for the whole or any part of the period from January 1, 2010, through and including the date of your response.
12. Where these Requests seek quantitative or computational information (*e.g.*, models, analyses, databases, formulas) stored by Piedmont or its consultants in machine-readable form, Piedmont is requested to furnish such machine-readable information as Excel worksheet files with formulas and links intact.
13. Responses to any of these Requests may include incorporation by reference to responses to other Requests only under the following circumstances:
 - (a) the reference is explicit and complies with instruction 11; and
 - (b) unless the entirety of the referenced response is to be incorporated, the specific information or documents of the referenced response shall be expressly identified.
14. Nucor requests that Piedmont send by overnight delivery service (such as Federal Express or a comparable service) or by electronic transmission one copy of its responses to this Request to the following:

Christopher J. Blake
Robert B. Josey
Nelson, Mullins, Riley & Scarborough, LLP
301 Hillsborough Street, Suite 1400
Raleigh, NC 27603
chris.blake@nelsonmullins.com
robert.josey@nelsonmullins.com

Weston Adams
Nelson, Mullins, Riley & Scarborough, LLP
301 S. College Street, 23rd Floor
Charlotte, NC 28202
weston.adams@nelsonmullins.com

Damon E. Xenopoulos
Laura W. Baker
Stone Mattheis Xenopoulos & Brew, PC
1025 Thomas Jefferson Street, N.W.
Suite 800 West Tower
Washington, DC 20007
dex@smxblaw.com
lwb@smxblaw.com

Responsive information and documents should be provided as they become available and should not be withheld until a complete response to all of Nucor's requests is available. Please provide answers within 10 days of receiving these requests.

DEFINITIONS

1. "Piedmont" or "the Company" refers to Piedmont Natural Gas Company, Inc., its subsidiaries, affiliates, officers, directors, agents, employees, and other persons acting in its behalf.
2. "Commission" means the North Carolina Utilities Commission.
3. "Nucor" means Nucor Steel-Hertford.
4. "Identify" means as follows:
 - (a) when used in reference to an individual, to state the full name and present or last known residence address and telephone number, present or last known position and business affiliation, and the position and business affiliation of the individual at the time in question;
 - (b) when used in reference to a commercial or governmental entity, to state its full name, type of entity (*e.g.*, corporation, partnership, single proprietorship), and its present or last known address;
 - (c) when used in reference to a document, to state the date, author, title, type of document (*e.g.*, letter, memorandum, photograph, tape recording, etc.), and its present or last known location and custodian;
 - (d) when used in reference to a communication, to state the type of communication (*e.g.*, letter, personal conversation, etc.), the date thereof, and the parties thereto and, in the case of a conversation, to state the substance, place, and approximate time thereof, and identity of other persons in the presence of each party thereto; and
 - (e) when used in reference to an act, to state the substance of the act, the date, time, and place of performance, and the identity of the actor and all other persons present.
5. The term "document" as used in the Requests contained herein is used in its customary broad sense, and includes, without limitation, any kind of printed, recorded, written, graphic, or photographic matter and things similar to any of the foregoing, regardless of their author or origin. The term specifically includes reports, studies, statistics, projections, forecasts, decisions and orders, e-mail communications, intra-office and inter-office communications, correspondence, memoranda, financial data, summaries or records of conversations or interviews, statements, returns, diaries, workpapers, graphs, sketches, computer printouts, summaries or reports of investigations or negotiations, opinions or reports of consultants, photographs, brochures, bulletins, pamphlets, books, articles, advertisements, circulars, press releases, graphic records or representations or publications of any kind (including microfilm, videotape, and records, however produced or reproduced), electronic, mechanical and electrical records of any kind (including, without

limitation, tapes, tape cassettes, disks, and records), other data compilations (including, without limitation, input/output files, source codes, object codes, program documentation, computer programs, computer printouts, cards, tapes, disks, and recordings used in automated data processing together with the programming instructions and other material necessary to translate, understand or use the same), all drafts, prints, issues, alterations, modifications, changes and amendments to the foregoing, and all other documents or tangible things of whatever description that constitute or contain information within the scope of a Request that are in the possession of Piedmont. A Request seeking the identification or production of documents addressing, relating or referring to, or discussing a specified matter encompasses documents having a factual, contextual, or logical nexus to the matter, as well as documents making explicit or implicit reference thereto in the body of the documents. Originals and duplicates of the same document need not be separately identified or provided; however, drafts of a document or documents differing from one another by initials, interlineations, notations, erasures, file stamps, and the like shall be deemed to be distinct documents requiring separate identification or production.

6. “Communication” shall mean any transmission of information by oral, graphic, written, pictorial, or otherwise perceptible means, including, but not limited to, telephone conversations, letters, telegrams, e-mail and personal conversations. A Request seeking the identity of a communication addressing, relating or referring to, or discussing a specified matter encompasses documents having factual, contextual, or logical nexus to the matter, as well as communications in which explicit or implicit reference is made to the matter in the course of the communication.
7. The “substance” of a communication or act includes the essence, purport, or meaning of the same, as well as the exact words or actions involved.
8. Words expressing the singular number shall be deemed to express the plural number; those expressing the masculine gender shall be deemed to express the feminine and neuter genders; those expressing the past tense shall be deemed to express the present tense; and vice versa.
9. The unqualified terms “or” and “and” shall be construed either conjunctively or disjunctively to bring within the scope of these Requests any matters that might otherwise be construed to be outside their scope.
10. The unqualified term “person” shall mean an individual, corporation, partnership, unincorporated association or other business or governmental entity.
11. The term “*e.g.*” or “for example” indicates illustration by example, not limitation.

QUESTIONS

- NUC-1-1 On a continuing basis, identify and provide copies of all information provided by Piedmont to any party related to Docket G-9, Sub 837 (or the issues in this docket) including, but not limited to, correspondence, discovery and other requests for data and corresponding responses, oral or written.
- NUC-1-2 Identify and provide copies of documents and workpapers (including all related Excel files with working formulas and links intact) supporting and/or underlying all testimony and exhibits filed by Piedmont in Docket No. G-9, Sub 837.
- NUC-1-3 Provide copies of all data requests issued to Piedmont in this proceeding.
- NUC-1-4 Provide copies of all data requests issued by Piedmont in this proceeding.
- NUC-1-5 Provide all answers submitted by Piedmont in response to data requests of all parties in this proceeding.
- NUC-1-6 Provide all answers submitted in response to data requests of Piedmont in this proceeding.
- NUC-1-7 Identify and provide all documents and communications by and between Piedmont and the Public Staff of the NCUC in this proceeding.

Respectfully submitted,

NELSON MULLINS RILEY & SCARBOROUGH, LLP

By: 
 Christopher J. Blake
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 Weston Adams, III
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 Damon E. Xenopoulos*
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 Washington, DC 20007
dex@smxblaw.com
 *Of Counsel
 Attorneys for Nucor Steel-Hertford

Dated: June 20, 2024

CERTIFICATE OF SERVICE

The undersigned attorney for Nucor Steel-Hertford hereby certifies that he served the foregoing upon the parties of record in this proceeding by electronic mail and/or depositing copies in the United States mail, postage prepaid.

Jim Jeffries
jjeffries@mcguirewoods.com

Brian Franklin
bfranklin@mcguirewoods.com

Mason Maney
mmaney@mcguirewoods.com

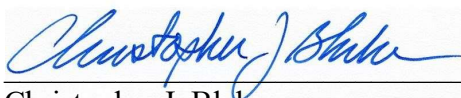
Brian Heslin
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Cindy Maimone
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PNG Rates & Regulatory
PNGRatesandRegulatory@duke-energy.com

This 20th day of June, 2024.



Christopher J. Blake

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing *Objections of Piedmont Natural Gas Company, Inc. to Nucor Steel-Hertford's First Set of Data Requests* is being served this date upon all parties of record electronically or by depositing a copy of the same in the United States Mail, First Class Postage Prepaid, at the address contained in the official service list in this proceeding.

This the 26th day of June, 2024.

/s/ Cindy Maimone
Cindy Maimone