

April 2, 2019

Ms. M. Lynn Jarvis
Chief Clerk
North Carolina Utilities Commission
430 N. Salisbury Street, Dobbs Building
Raleigh, North Carolina 27603

Re: Docket No. G-9, Sub 739

Dear Ms. Jarvis:

On February 8, 2019 in the above-referenced docket, the North Carolina Utilities Commission ("Commission") issued its *Order Requesting Additional Information* ("Order"). In the Order, the Commission indicated that, after reviewing Foothills Renewables, LLC ("Foothills") application filed in this docket, it required additional information about Foothills' proposed facility.

Piedmont has reviewed the Order and has determined that it is better situated to respond to requests that are specifically related to Piedmont's system. As such, please see the attached responses to questions 3, 6, 8, and 9 of the Commission's Order.

Please note that these responses contain information that is confidential in nature, accordingly, Piedmont requests that this information be treated as the confidential and proprietary trade secret of Piedmont as provided in N.C. Gen. Stat. § 132-1.2. Piedmont has also included for filing redacted public versions of these responses.

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

Sincerely,

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

JHJ/rkg

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the attached is being served this date upon all of the parties to this docket electronically or by depositing a copy of the same in the United States Mail, First Class Postage Prepaid, at the addresses contained in the official service list in this proceeding.

This the 2nd day of April, 2019.

/s/ Richard K. Goley
Richard K. Goley

REDACTED RESPONSE

**STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH**

DOCKET NO. G-9, SUB 739

In the Matter of:

Application of Foothills)	
Renewables, LLC for Approval)	RESPONSE TO COMMISSION
to Participate in Alternative)	REQUEST FOR ADDITIONAL
Gas Pilot Program)	INFORMATION
)	

Piedmont Natural Gas Company, Inc. ("Piedmont"), through counsel and pursuant to the *Order Requesting Additional Information* ("Order") issued by the North Carolina Utilities Commission ("Commission") in this docket on February 8, 2019, respectfully submits the following information regarding the proposed interconnection of the Alternative Gas production facilities of Foothills Renewables, LLC ("Foothills") with Piedmont.

BACKGROUND

On January 4, 2019, Foothills filed an application requesting authorization to participate in the alternative gas pilot program ("Pilot Program") established by the Commission's *Order Approving Appendix F and Establishing Pilot Program in Docket No. G-9, Sub 698* ("Application"). In its Application, Foothills detailed its plans to produce Alternative Gas derived from 100% solid waste landfill gas feedstock.

On February 8, 2019, the Commission issued its *Order Requesting Additional Information* in which it directed Foothills to answer ten questions regarding the proposed facility in order to assist the Commission in evaluating the Application.

In the Order, the Commission also requested information related to Piedmont's

system at the interconnection point proposed by Foothills. Foothills does not have access to the information requested in Commission questions 3, 6, 8, and 9 but Piedmont does. Piedmont has consulted with Foothills and confirmed that Piedmont should respond to these particular questions. Accordingly, Piedmont hereby respectfully submits the answers to Commission questions 3, 6(b)-(e), 8, and 9, which contain information that is confidential in nature pursuant to N.C. Gen. Stat. § 132-1.2.

RESPONSES

3. Whether there is a Piedmont pipeline in close proximity to the Foothill's facility and, if so, why Foothills is choosing not to interconnect with Piedmont at that pipeline location.

Response: The Foothills facility is not located within a close proximity of a Piedmont high-pressure pipeline that would be available to accept the alternative gas year-round. The closest proximity of an injection point would be approximately 5-miles and because the Foothills facility is located at the end of a Piedmont pipeline branch there could times throughout the year where injections were not feasible because of limited customer demand on the system during the summer time.

6. The physical details of the injection point proposed by Foothills, including:
 - (b) A detailed description of all equipment that will be required at the injection point.
 - (c) Whether the injection site will be fenced and have other security protections.
 - (d) Whether the injection site will be staffed full-time and, if so, the details of the number of employees, their jobs, and by whom they will be employed.
 - (e) Whether other Alternative Gas suppliers will be offered use of the injection point facilities.

Response:

- (b) With regard to the Piedmont Measurement Facilities at the injection point, Piedmont will design, construct, install, own, operate, and maintain facilities including, but not limited to, gas monitoring equipment and telemetry, meters, regulators, valves, gas analyzers, odorization equipment, a corrosion coupon testing station, shut-in valves, separators, filters, tap facilities, pipeline, etc.
- (c) Piedmont's Measurement Facilities at each injection point will be fenced and secured through a locked point of entry accessible only by Piedmont employees.
- (d) The Piedmont Measurement Facilities at each injection point will not be manned.
- (e) Piedmont has no current arrangements (or plans) with other Alternative Gas suppliers that would permit use of the proposed Foothills injection point.
8. The size and operating pressure of Piedmont's pipeline at the proposed injection point.

Response: [REDACTED]

9. The current winter and summer volumes on Piedmont's line at the proposed injection point and the direction of flow.

Response: [REDACTED]

CONCLUSION

Piedmont respectfully requests that the Commission accept the responses to Commission questions 3, 6(b)-(e), 8, and 9 from its February 8, 2019 Order in this proceeding as set forth herein.

This the 2nd day of April, 2019.

Piedmont Natural Gas Company, Inc.

/s/ James H. Jeffries IV

James H. Jeffries IV

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