

February 13, 2020

VIA ELECTRONIC FILING

Ms. Kimberley A. Campbell
Chief Clerk
North Carolina Utilities Commission
430 N. Salisbury Street, Dobbs Building
Raleigh, North Carolina 27603

Re: Docket No. G-9, Sub 764

Dear Ms. Campbell:

On January 30, 2020, in the above-referenced docket, the North Carolina Utilities Commission (“Commission”) issued its *Order Requesting Additional Information From Applicant and Public Staff Comments* (“Order”). In that Order, the Commission indicated that, after reviewing the application of Align RNG North Carolina, LLC, d/b/a Align Renewable Natural Gas (“Align RNG”) in this matter, and it required additional information about Align RNG’s proposed Alternative Gas facilities.

Piedmont Natural Gas Company, Inc. (“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 5 and 6 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/sko

cc: Elizabeth Culpepper
Bruce Barkley
Pia Powers
David Nestor

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 13th day of February, 2020.

/s/ Sloane K. O'Hare
Sloane K. O'Hare

G-9, Sub 764

REDACTED

**STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH**

DOCKET NO. G-9, SUB 764

In the Matter of:

Application of Align RNG North
Carolina, LLC, D/B/A Align
Renewable Natural Gas, to
Participate in Pilot Program

)
)
)
)
)
)

RESPONSE TO COMMISSION
REQUEST FOR ADDITIONAL
INFORMATION

Piedmont Natural Gas Company, Inc. (“Piedmont”), through counsel and pursuant to the *Order Requesting Additional Information From Applicant and Public Staff Comments* (“Order”) issued by the North Carolina Utilities Commission (“Commission”) in this docket on January 30, 2020, respectfully submits the following information regarding the proposed interconnection of the Alternative Gas production facilities of Align RNG North Carolina, LLC, d/b/a Align Renewable Natural Gas (“Align RNG”) with Piedmont.

BACKGROUND

On January 17, 2020, Align RNG 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, Align RNG detailed its plans to construct Alternative Gas gathering facilities on 19 farms in Duplin and Sampson Counties to supply methane generated from swine manure for the production of Alternative Gas. Further, Align RNG stated that it will construct a centralized Alternative Gas upgrading facility located near the intersection of Old Courthouse Road and NC Hwy 24 between the Towns of Warsaw and Turkey, and approximately 30 miles of gathering pipeline to interconnect each participating farm to the centralized gas

upgrading facility.

On January 30, 2020, the Commission issued its *Order Requesting Additional Information from Applicant and Public Staff Comments* in which it directed Align RNG to answer eight 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 injection point(s) proposed by Align RNG. Align RNG does not have access to the information requested in Commission questions 5 and 6 but Piedmont does. Piedmont has consulted with Align RNG and confirmed that Piedmont should respond to these particular questions. Accordingly, Piedmont hereby respectfully submits the answers to Commission questions 5 and 6, which contain information that is confidential in nature pursuant to N.C. Gen. Stat. § 132-1.2.

RESPONSES

3. The size and operating pressure of Piedmont's pipeline at the proposed injection point(s).

Response: [REDACTED]

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

Response: [REDACTED]

CONCLUSION

Piedmont respectfully requests that the Commission accept the responses to Commission questions 5 and 6 from its January 30, 2020 Order in this proceeding as set forth herein.

This the 13th day of February, 2020.

Piedmont Natural Gas Company, Inc.

/s/ James H. Jeffries IV

James H. Jeffries IV

McGuireWoods LLP

201 North Tryon Street, Suite 3000

Charlotte, NC 28202

Telephone: 704-343-2348

Email: jjeffries@mcguirewoods.com