

March 1, 2019

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

Re: Docket Nos. G-9, Sub 728 & SP-13243, Sub 0

Dear Ms. Jarvis:

On January 31, 2019 in the above-referenced dockets, the North Carolina Utilities Commission ("Commission") issued its *Order Requesting Additional Information* ("Order"). In the Order, the Commission indicated that, after reviewing GESS International North Carolina, Inc.'s ("GESS") amended application filed in the above-referenced dockets, it required additional information about GESS' proposed facilities.

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 10, 11(c), 14, and 15 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 1st day of March, 2019.

/s/ Richard K. Goley
Richard K. Goley

REDACTED RESPONSE

**STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH**

In the Matter of:

DOCKET NO. G-9, SUB 728)	
)	
Application of GESS International)	
North Carolina, Inc. for Approval to)	
Participate in Alternative Gas)	
Pilot Program and for Approval)	
Of Receipt Agreements)	
)	RESPONSE TO COMMISSION
)	REQUEST FOR ADDITIONAL
DOCKET NO. SP-13243, SUB 0)	INFORMATION
)	
Application of GESS International)	
North Carolina, Inc. for)	
Declaratory Rulings)	
)	

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 January 31, 2019, respectfully submits the following information regarding the proposed interconnection of the Alternative Gas production facilities of GESS International North Carolina, Inc. (“GESS”) with Piedmont.

BACKGROUND

On August 30, 2018, GESS 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, GESS detailed its plans to produce Alternative Gas derived from five anaerobic digestion facilities located in five counties.

On September 6, 2018, in Docket No. G-9, Sub 728, Piedmont filed a Statement of Position in order to clarify a number of assertions made by GESS in its application.

On January 2, 2019, GESS filed an amended application to address the concerns raised by Piedmont in its Statement of Position.

On January 28, 2019, the Public Staff filed a letter stating that it reviewed GESS' amended application and it has no objection to GESS participating in the pilot program, subject to Commission approval of a receipt interconnect agreement between GESS and Piedmont.

On January 31, 2019, the Commission issued its *Order Requesting Additional Information* in which it directed GESS to answer fifteen questions regarding the proposed facilities in order to assist the Commission in evaluating the Amended Application.

In the Order, the Commission also requested information related to Piedmont's system at the injection points proposed by GESS. GESS does not have access to the complete information requested in Commission questions 10, 11(c), 14, and 15, but Piedmont does. Piedmont has consulted with GESS and confirmed that Piedmont will respond to these particular questions. Accordingly, Piedmont hereby respectfully submits the answers to Commission questions 10, 11(c), 14, and 15. Piedmont hereby designates the responses to Commission questions 14 and 15 as the confidential and proprietary trade secret of Piedmont pursuant to N.C. Gen. Stat. § 132-1.2.

RESPONSES

10. The physical details of the three injection points proposed by GESS, including:

(a) A description of all equipment that will be required.

Response: With regard to the Piedmont Measurement Facilities at each 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.

(b) Whether each injection site will be fenced and have other security protections.

Response: Piedmont's Measurement Facilities at each injection point will be fenced and secured through a locked point of entry accessible only by Piedmont employees.

(c) Whether each 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.

Response: The Piedmont Measurement Facilities at each injection point will not be manned.

(d) Whether other Alternative Gas suppliers will be offered use of the injection point facilities.

Response: Piedmont has no current arrangements (or plans) with other Alternative Gas suppliers that would permit use of any of the three proposed GESS injection points.

11(c). Will Piedmont have the authority to require or reject having a GESS facility use an injection point other than the one designated for that facility?

Response: Piedmont has no such right under its approved tariffs or under its proposed form of Receipt Interconnect Agreement with GESS. As a practical matter, Piedmont is not able to monitor the source of Alternative Gas delivered to Piedmont at injection points such as those proposed by GESS. The maximum quantity of such Alternative Gas deliverable by GESS at each of the projected injection points will be capped under the Receipt Interconnect Agreement, however, and all Alternative Gas delivered by GESS to any injection point will be subject to Appendix F of Piedmont's North Carolina Service Regulations as recently approved by the Commission in Docket No. G-9, Sub 698.

14. The size and operating pressure of Piedmont's pipeline at the proposed injection points.

Response:

[REDACTED]

[REDACTED]

[REDACTED]

15. The current winter and summer volumes on Piedmont's line at the proposed injection points, and the direction of flow.

Response:

[REDACTED]

[REDACTED]

[REDACTED]

CONCLUSION

Piedmont respectfully requests that the Commission accept the responses to Commission questions 10, 11(c), 14, and 15 from its January 31, 2019 Order in this proceeding as set forth herein.

This the 1st day of March, 2019.

Piedmont Natural Gas Company, Inc.

/s/ James H. Jeffries IV

James H. Jeffries IV

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