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McGUIREWOODS

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September 22, 2021

**VIA ELECTRONIC FILING**

Ms. Antonia Dunston  
Interim Chief Clerk  
North Carolina Utilities Commission  
430 N. Salisbury Street, Dobbs Building  
Raleigh, North Carolina 27603

**Re: Docket No. G-9, Sub 781  
Docket No. G-9, Sub 786  
Docket No. G-9, Sub 722**

Dear Ms. Dunston:

In response to the request of Chair Charlotte A. Mitchell at the September 9, 2021 Hearing in the above-referenced dockets, please see the attached Late-Filed Exhibits of Piedmont Natural Gas Company, Inc. ("Piedmont").

- Late-Filed Exhibit No. 2: shows the rate-of-return and rate-of-return index for Piedmont's stipulated rates in the two scenarios prescribed by Chair Mitchell;
- Late-Filed Exhibit No. 3: shows the proposed increase and proposed revenues in the two scenarios prescribed by Chair Mitchell, which are the same schedules as those shown in Exhibit J1 and Exhibit J2 of the Stipulation of Partial Settlement filed on September 7, 2021 in this proceeding;
- CONFIDENTIAL Late-Filed Exhibit No. 4: shows the DEC-Lincoln CT 17 hypothetical monthly bill computations for CY2020 requested by Chair Mitchell, and also includes for comparison purposes the amounts as billed pursuant to the Special Contract;
- Late-Filed Exhibit No. 5: displays the combined cost of Line 456 and Line 457.

Please note that Late-Filed Exhibit No. 4 contains information that is confidential in nature, Piedmont hereby designates this exhibit as such, pursuant to N.C. Gen. Stat. § 132-1.2, and requests that the Commission treat this exhibit in a manner consistent with this designation.

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.

September 22, 2021

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Sincerely,

/s/ James H. Jeffries IV

James H. Jeffries IV

JHJ/rkg

Enclosure

cc: Elizabeth Culpepper  
Bruce Barkley  
Pia Powers  
Parties of Record

**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 22nd day of September, 2021.

/s/ Richard K. Goley  
Richard K. Goley

# **Late-Filed Exhibit No. 2**

**Piedmont Natural Gas Company, Inc.**  
**Docket No. G-9, Sub 781**  
**Comparison of Stipulation Rates of Return**

		<i>Excluding Robeson LNG and Pender-Onslow</i>			
Rate Schedule	Description	Proforma Existing Rates		Stipulated Rates	
		ROR	ROR Index	ROR	ROR Index
101	Residential	6.1%	0.98	7.0%	1.02
102	Small General	10.2%	1.65	11.4%	1.66
152	Medium General	17.9%	2.89	19.6%	2.84
103	Large General Sales	-3.1%	(0.51)	-3.0%	(0.43)
113	Large General Transportation	-3.3%	(0.54)	-3.0%	(0.43)
103/113	<i>Large General Combined</i>	-3.3%	(0.53)	-3.0%	(0.43)
104	Large Interruptible Sales	26.4%	4.26	25.2%	3.65
114	Large Interruptible Transportation	20.1%	3.25	19.6%	2.84
104/114	<i>Large Interruptible Combined</i>	20.3%	3.28	19.7%	2.86
T-10	Military Transportation	-3.1%	(0.49)	-2.7%	(0.40)
<b>Overall Rate of Return</b>		<b>6.2%</b>	<b>1.00</b>	<b>6.9%</b>	<b>1.00</b>

		<i>Including Robeson LNG and Pender-Onslow</i>			
Rate Schedule	Description	Proforma Existing Rates		Stipulated Rates	
		ROR	ROR Index	ROR	ROR Index
101	Residential	5.5%	0.96	7.1%	1.03
102	Small General	9.0%	1.58	11.0%	1.60
152	Medium General	15.5%	2.71	18.2%	2.63
103	Large General Sales	-3.2%	(0.56)	-2.8%	(0.41)
113	Large General Transportation	-3.2%	(0.56)	-2.5%	(0.36)
103/113	<i>Large General Combined</i>	-3.2%	(0.56)	-2.5%	(0.37)
104	Large Interruptible Sales	25.7%	4.51	24.0%	3.48
114	Large Interruptible Transportation	19.6%	3.43	18.6%	2.70
104/114	<i>Large Interruptible Combined</i>	19.7%	3.46	18.7%	2.72
T-10	Military Transportation	-2.9%	(0.51)	-2.3%	(0.33)
<b>Overall Rate of Return</b>		<b>5.7%</b>	<b>1.00</b>	<b>6.9%</b>	<b>1.00</b>

# **Late-Filed Exhibit No. 3**

**Piedmont Natural Gas Company, Inc.**  
**Docket No. G-9, Sub 781**  
**Comparison of End of Period Revenues to Stipulated Revenues by Class**  
*Excluding Robeson LNG and Pender-Onslow*

	[A]	[B]	[C]	[D]	[E]	[F]
Line No.	Revenue Class	Tariff Rate Schedule	End of Period Revenues	Total Revenue Increase (Decrease) <sup>1</sup>	Total Stipulated Revenues <sup>1</sup>	Overall Percent Increase (Decrease)
1	Residential Service	101	589,322,493	25,654,959	614,977,452	4.4%
2	Small General Service	102	271,583,679	12,731,274	284,314,953	4.7%
3	Medium General Service	152	46,058,357	2,031,976	48,090,333	4.4%
4	Natural Gas Vehicle Fuel	142	1,095,716	38,238	1,133,954	3.5%
5	Outdoor Gas Light Service	105	102,158	3,670	105,828	3.6%
6	Large General Sales Service	103	14,851,002	69,825	14,920,828	0.5%
7	Large General Transportation Service	113	32,051,843	1,031,456	33,083,298	3.2%
8	Firm Large General Service	103 / 113	46,902,845	1,101,281	48,004,126	2.3%
9	Interruptible Large General Sales Service	104	3,481,316	(19,418)	3,461,898	-0.6%
10	Interruptible Large General Transportation Service	114	25,013,809	(541,903)	24,471,906	-2.2%
11	Interruptible Large General Service	104 / 114	28,495,125	(561,321)	27,933,804	-2.0%
12	Military Operations Transportation Service	T-10	2,278,997	95,905	2,374,902	4.2%
13	<b>Tariff Sales and Transportation Revenue</b>		<b>985,839,371</b>	<b>41,095,982</b>	<b>1,026,935,353</b>	<b>4.2%</b>
14	Power Generation Special Contracts		106,299,276	-	106,299,276	0.0%
15	Other Special Contracts		20,557,679	(32,136)	20,525,543	-0.2%
16	<b>Total Sales and Transportation Revenue</b>		<b>1,112,696,326</b>	<b>41,063,846</b>	<b>1,153,760,172</b>	<b>3.7%</b>
17	Other Revenues		3,030,299	-	3,030,299	0.0%
18	<b>Total Operating Revenue</b>		<b>1,115,726,625</b>	<b>41,063,846</b>	<b>1,156,790,471</b>	<b>3.7%</b>

1/ The target Total Stipulated Revenues used for this exhibit is \$1,156,791,572. The calculations shown in this exhibit yield a rounding difference for Total Stipulated Revenues of \$1,101.

**Piedmont Natural Gas Company, Inc.**  
**Docket No. G-9, Sub 781**  
**Comparison of End of Period Revenues to Proposed Revenues by Class**  
*Excluding Robeson LNG and Pender-Onslow*

	[A]	[B]	[C]	[D]	[E]	[F]	[G]	[H]	[I]	[J]	[K]
Line No.	Revenue Class	Tariff Rate Schedule	End of Period Revenues	Stipulated Margin Revenue Increase (Decrease) <sup>1</sup>	Stipulated Revenues Before COG Change <sup>1</sup>	Margin Percent Increase (Decrease)	Stipulated COG Demand Revenue Increase (Decrease) <sup>1</sup>	Stipulated COG Commodity Revenue Increase (Decrease) <sup>1</sup>	Total Stipulated Revenues <sup>1</sup>	COG Percent Increase (Decrease)	Overall Percent Increase (Decrease)
1	Residential Service	101	589,322,493	21,191,751	610,514,244	3.6%	5,044,322	(581,114)	614,977,452	0.7%	4.4%
2	Small General Service	102	271,583,679	9,732,127	281,315,806	3.6%	3,368,725	(369,578)	284,314,953	1.1%	4.7%
3	Medium General Service	152	46,058,357	1,551,632	47,609,990	3.4%	554,877	(74,534)	48,090,333	1.0%	4.4%
4	Natural Gas Vehicle Fuel	142	1,095,716	39,394	1,135,109	3.6%	-	(1,156)	1,133,954	-0.1%	3.5%
5	Outdoor Gas Light Service	105	102,158	3,670	105,828	3.6%	-	-	105,828	0.0%	3.6%
6	Large General Sales Service	103	14,851,002	108,058	14,959,061	0.7%	-	(38,233)	14,920,828	-0.3%	0.5%
7	Large General Transportation Service	113	32,051,843	1,515,794	33,567,637	4.7%	-	(484,339)	33,083,298	-1.4%	3.2%
8	Firm Large General Service	103 / 113	46,902,845	1,623,852	48,526,698	3.5%	-	(522,572)	48,004,126	-1.1%	2.3%
9	Interruptible Large General Sales Service	104	3,481,316	(9,325)	3,471,991	-0.3%	-	(10,093)	3,461,898	-0.3%	-0.6%
10	Interruptible Large General Transportation Service	114	25,013,809	(115,890)	24,897,919	-0.5%	-	(426,013)	24,471,906	-1.7%	-2.2%
11	Interruptible Large General Service	104 / 114	28,495,125	(125,215)	28,369,911	-0.4%	-	(436,106)	27,933,804	-1.5%	-2.0%
12	Military Operations Transportation Service	T-10	2,278,997	114,560	2,393,557	5.0%	-	(18,655)	2,374,902	-0.8%	4.2%
13	<b>Tariff Sales and Transportation Revenue</b>		<b>985,839,371</b>	<b>34,131,772</b>	<b>1,019,971,143</b>	<b>3.5%</b>	<b>8,967,924</b>	<b>(2,003,715)</b>	<b>1,026,935,353</b>	<b>0.7%</b>	<b>4.2%</b>
14	Power Generation Special Contracts		106,299,276	-	106,299,276	0.0%	-	-	106,299,276	0.0%	0.0%
15	Other Special Contracts		20,557,679	-	20,557,679	0.0%	-	(32,136)	20,525,543	-0.2%	-0.2%
16	<b>Total Sales and Transportation Revenue</b>		<b>1,112,696,326</b>	<b>34,131,772</b>	<b>1,146,828,098</b>	<b>3.1%</b>	<b>8,967,924</b>	<b>(2,035,851)</b>	<b>1,153,760,172</b>	<b>0.6%</b>	<b>3.7%</b>
17	Other Revenues		3,030,299	-	3,030,299	0.0%	-	-	3,030,299	0.0%	0.0%
18	<b>Total Operating Revenue</b>		<b>1,115,726,625</b>	<b>34,131,772</b>	<b>1,149,858,397</b>	<b>3.1%</b>	<b>8,967,924</b>	<b>(2,035,851)</b>	<b>1,156,790,471</b>	<b>0.6%</b>	<b>3.7%</b>

1/ The target Total Stipulated Revenues used for this exhibit is \$1,156,791,572. The calculations shown in this exhibit yield a rounding difference for Total Stipulated Revenues of \$1,101.

**Piedmont Natural Gas Company, Inc.**  
**Docket No. G-9, Sub 781**  
**Comparison of End of Period Revenues to Stipulated Revenues by Class**  
*Including Robeson LNG and Pender-Onslow*

	[A]	[B]	[C]	[D]	[E]	[F]
Line No.	Revenue Class	Tariff Rate Schedule	End of Period Revenues	Total Revenue Increase (Decrease) <sup>1</sup>	Total Stipulated Revenues <sup>1</sup>	Overall Percent Increase (Decrease)
1	Residential Service	101	589,322,493	46,001,797	635,324,290	7.8%
2	Small General Service	102	271,583,679	22,090,586	293,674,265	8.1%
3	Medium General Service	152	46,058,357	3,540,282	49,598,639	7.7%
4	Natural Gas Vehicle Fuel	142	1,095,716	75,561	1,171,276	6.9%
5	Outdoor Gas Light Service	105	102,158	7,178	109,336	7.0%
6	Large General Sales Service	103	14,851,002	249,232	15,100,234	1.7%
7	Large General Transportation Service	113	32,051,843	2,481,215	34,533,058	7.7%
8	Firm Large General Service	103 / 113	46,902,845	2,730,447	49,633,292	5.8%
9	Interruptible Large General Sales Service	104	3,481,316	(23,650)	3,457,666	-0.7%
10	Interruptible Large General Transportation Service	114	25,013,809	(666,829)	24,346,981	-2.7%
11	Interruptible Large General Service	104 / 114	28,495,125	(690,479)	27,804,647	-2.4%
12	Military Operations Transportation Service	T-10	2,278,997	210,337	2,489,334	9.2%
13	<b>Tariff Sales and Transportation Revenue</b>		<b>985,839,371</b>	<b>73,965,709</b>	<b>1,059,805,079</b>	<b>7.5%</b>
14	Power Generation Special Contracts		106,299,276	-	106,299,276	0.0%
15	Other Special Contracts		20,557,679	(32,136)	20,525,543	-0.2%
16	<b>Total Sales and Transportation Revenue</b>		<b>1,112,696,326</b>	<b>73,933,573</b>	<b>1,186,629,898</b>	<b>6.6%</b>
17	Other Revenues		3,030,299	-	3,030,299	0.0%
18	<b>Total Operating Revenue</b>		<b>1,115,726,625</b>	<b>73,933,573</b>	<b>1,189,660,197</b>	<b>6.6%</b>

1/ The target margin revenue increase used for this exhibit is \$67,000,000. Hence, the target Total Stipulated Revenues used for this exhibit is \$1,189,657,912. This target amount is in lieu of Total Stipulated Revenues of \$1,189,795,111 shown in Exhibit A2. The calculations shown in this exhibit yield a rounding difference for Total Stipulated Revenues of \$2,285.

**Piedmont Natural Gas Company, Inc.**  
**Docket No. G-9, Sub 781**  
**Comparison of End of Period Revenues to Proposed Revenues by Class**  
*Including Robeson LNG and Pender-Onslow*

	[A]	[B]	[C]	[D]	[E]	[F]	[G]	[H]	[I]	[J]	[K]
Line No.	Revenue Class	Tariff Rate Schedule	End of Period Revenues	Stipulated Margin Revenue Increase (Decrease) <sup>1</sup>	Stipulated Revenues Before COG Change <sup>1</sup>	Margin Percent Increase (Decrease)	Stipulated COG Demand Revenue Increase (Decrease) <sup>1</sup>	Stipulated COG Commodity Revenue Increase (Decrease) <sup>1</sup>	Total Stipulated Revenues <sup>1</sup>	COG Percent Increase (Decrease)	Overall Percent Increase (Decrease)
1	Residential Service	101	589,322,493	41,538,589	630,861,082	7.0%	5,044,322	(581,114)	635,324,290	0.7%	7.8%
2	Small General Service	102	271,583,679	19,091,439	290,675,118	7.0%	3,368,725	(369,578)	293,674,265	1.0%	8.1%
3	Medium General Service	152	46,058,357	3,059,939	49,118,296	6.6%	554,877	(74,534)	49,598,639	1.0%	7.7%
4	Natural Gas Vehicle Fuel	142	1,095,716	76,716	1,172,432	7.0%	-	(1,156)	1,171,276	-0.1%	6.9%
5	Outdoor Gas Light Service	105	102,158	7,178	109,336	7.0%	-	-	109,336	0.0%	7.0%
6	Large General Sales Service	103	14,851,002	287,465	15,138,467	1.9%	-	(38,233)	15,100,234	-0.3%	1.7%
7	Large General Transportation Service	113	32,051,843	2,965,554	35,017,396	9.3%	-	(484,339)	34,533,058	-1.4%	7.7%
8	Firm Large General Service	103 / 113	46,902,845	3,253,018	50,155,864	6.9%	-	(522,572)	49,633,292	-1.0%	5.8%
9	Interruptible Large General Sales Service	104	3,481,316	(13,557)	3,467,759	-0.4%	-	(10,093)	3,457,666	-0.3%	-0.7%
10	Interruptible Large General Transportation Service	114	25,013,809	(240,815)	24,772,994	-1.0%	-	(426,013)	24,346,981	-1.7%	-2.7%
11	Interruptible Large General Service	104 / 114	28,495,125	(254,372)	28,240,753	-0.9%	-	(436,106)	27,804,647	-1.5%	-2.4%
12	Military Operations Transportation Service	T-10	2,278,997	228,992	2,507,989	10.0%	-	(18,655)	2,489,334	-0.7%	9.2%
13	<b>Tariff Sales and Transportation Revenue</b>		<b>985,839,371</b>	<b>67,001,499</b>	<b>1,052,840,870</b>	<b>6.8%</b>	<b>8,967,924</b>	<b>(2,003,715)</b>	<b>1,059,805,079</b>	<b>0.7%</b>	<b>7.5%</b>
14	Power Generation Special Contracts		106,299,276	-	106,299,276	0.0%	-	-	106,299,276	0.0%	0.0%
15	Other Special Contracts		20,557,679	-	20,557,679	0.0%	-	(32,136)	20,525,543	-0.2%	-0.2%
16	<b>Total Sales and Transportation Revenue</b>		<b>1,112,696,326</b>	<b>67,001,499</b>	<b>1,179,697,825</b>	<b>6.0%</b>	<b>8,967,924</b>	<b>(2,035,851)</b>	<b>1,186,629,898</b>	<b>0.6%</b>	<b>6.6%</b>
17	Other Revenues		3,030,299	-	3,030,299	0.0%	-	-	3,030,299	0.0%	0.0%
18	<b>Total Operating Revenue</b>		<b>1,115,726,625</b>	<b>67,001,499</b>	<b>1,182,728,124</b>	<b>6.0%</b>	<b>8,967,924</b>	<b>(2,035,851)</b>	<b>1,189,660,197</b>	<b>0.6%</b>	<b>6.6%</b>

1/ The target margin revenue increase used for this exhibit is \$67,000,000. Hence, the target Total Stipulated Revenues used for this exhibit is \$1,189,657,912. This target amount is in lieu of Total Stipulated Revenues of \$1,189,795,111 shown in Exhibit A2. The calculations shown in this exhibit yield a rounding difference for Total Stipulated Revenues of \$2,285.

# **Late-Filed Exhibit No. 4**

**Exhibit has been filed confidentially pursuant to  
N.C. Gen. Stat. § 132-1.2.**

# **Late-Filed Exhibit No. 5**

Docket No. G-9, Sub 781  
Piedmont Natural Gas Company, Inc.  
Late-Filed Exhibit No. 5

The combined cost of Line 456 and Line 457, as recorded to Utility Plant in Service on Piedmont's Balance Sheet as of June 30, 2021, is: \$33,390,451.