

March 12, 2021

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 728

Dear Ms. Campbell:

On February 15, 2021, GESS RNG Biogas USA, LLC (“GESS RNG”) filed its Motion to Amend Order Approving Participation in Pilot Program with Conditions and its Second Supplemental and Amended Requests for Declaratory Rulings (“Filings”) in this docket. In the Filings, GESS RNG stated that it is successor in interest to GESS International North Carolina, Inc. (“GESS International”) and that GESS International has assigned and transferred all of its rights and interests in this matter to GESS RNG.

On February 17, 2021, Duke Energy Carolinas, LLC (“DEC”) and Duke Energy Progress, LLC (“DEP”) jointly filed a letter in response to GESS RNG’s Filing in this docket (“DEC/DEP Letter”). In the DEC/DEP letter, the electric companies state that DEC and DEP are not likely to use Alternative Gas from GESS RNG due to prior contracts with GESS International having been terminated due to failure to perform.

In light of the foregoing, Piedmont Natural Gas Company, Inc. (“Piedmont”) takes no position on the underlying merits of GESS RNG’s filings but would remind the Commission that Appendix F of Piedmont’s North Carolina Service Regulations requires that all Alternative Gas delivered to Piedmont must be nominated for use by and allocated to a Piedmont Customer. If DEC and DEP are not GESS RNG’s customers, which appears to be the case, then the current record may not be sufficient to support Piedmont’s receipt of Alternative Gas from GESS RNG facilities.

March 12, 2021

Page 2

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

cc: Elizabeth Culpepper
Bruce Barkley
Pia Powers

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Mar 12 2021

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 12th day of March, 2021.

/s/ Richard K. Goley
Richard K. Goley