

**Threatt, Linnetta**

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**From:** Ebru Koylu (alevalev89@gmail.com) Sent You a Personal Message  
<automail@knowwho.com>  
**Sent:** Tuesday, October 2, 2018 1:38 PM  
**To:** Statements  
**Subject:** Docket Number is G-9, Sub 727 for Piedmont's Annual Review of Gas Costs proceeding

Dear North Carolina Utilities Commission,

In its recent filing to the NC Utilities Commission, Piedmont Natural Gas Company fails to show that its gas costs were prudently incurred. The Commission should take a hard look at Piedmont's gas purchasing practices to make sure that it is ensuring the lowest cost for its customers. Piedmont itself and its parent company, Duke Energy, are a primary owner of the proposed \$6+ billion Atlantic Coast Pipeline (ACP). The Commission should be concerned that Duke and Piedmont are engaging in self-dealing, and passing unreasonable costs onto captive rate payers to make a lucrative profit for Duke shareholders.

Piedmont claims its gas costs incurred are "prudent", however the ACP and the proposed Piedmont Pipeline, are not needed to meet demand for gas in North Carolina. There is enough capacity on the existing Transco pipeline. In fact, Transco recently made a filing with the South Carolina Public Service Commission stating "Transco has the infrastructure and pipeline in place to serve the Southeast, including South Carolina, for many years." The same is true for North Carolina. Simultaneously, Piedmont fails to offer comprehensive energy efficiency programs for customers, and NCUC should require other programs to reduce Piedmont's costs and help customers save money on their bills.

The Commission should not allow Piedmont to charge customers for building unnecessary pipelines like the Atlantic Coast Pipeline, the sole purpose of which is not to meet demand or provide lowest cost resources for customers, but rather to make more profit for Piedmont and Duke Energy shareholders at the expense of already vulnerable communities and ratepayers. Furthermore, the Commission should apply heightened scrutiny to determine whether rate hikes related to new pipeline transportation costs are just and reasonable, especially when affiliate self-dealing is involved, as in this case.

The Commission should also look carefully at Piedmont's claim that the new Liquefied Natural Gas facility proposed in Robeson County "need is independent from the Atlantic Coast Pipeline (ACP) supply." We request an independent study ensuring this major infrastructure project is necessary and worth the cost of ~\$250 million to ratepayers. The Commission should also assert their authority to review the contracts between Duke and Piedmont regarding this facility and the relationship with the proposed ACP.

In addition to applying higher scrutiny in this docket, I request the NCUC act in the best interest of North Carolina customers by asserting their authority to review contracts between the utilities they regulate and the proposed gas pipelines in which affiliates of these same companies are investing. NCUC should also file protests in relevant FERC pipeline dockets immediately, demanding that FERC fully evaluate the market need for any new pipeline that would impact their state's ratepayers.

Sincerely,

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