

July 1, 2024

VIA ELECTRONIC FILING

Ms. A. Shonta Dunston
Chief Clerk
North Carolina Utilities Commission
430 North Salisbury Street, Dobbs Building
Raleigh, NC 27603

Re: Docket No. G-9, Sub 837

Dear Ms. Dunston:

Enclosed for filing with the North Carolina Utilities Commission, please find the Objections of Piedmont Natural Gas Company, Inc. (“Piedmont”) to Carolina Utility Customers Association, Inc.’s First and Second Set of Data Requests served on Piedmont in the above-captioned docket.

Thank you for your assistance with this matter. If you have any questions about this filing, you may reach me at the number shown above.

Sincerely,

/s/ James H. Jeffries IV
James H. Jeffries IV

JHJ/cm

Enclosures

cc: Parties of record

STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH

DOCKET NO. G-9, SUB 837

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

| | | |
|--|---|--------------------------------------|
| In the Matter of: |) | |
| Application of Piedmont Natural Gas Company, |) | |
| Inc., for an Adjustment of Rates, Charges, and |) | OBJECTIONS OF PIEDMONT |
| Tariffs Applicable to Service in North Carolina, |) | NATURAL GAS COMPANY, INC. TO |
| Continuation of its IMR Mechanism, Adoption |) | CAROLINA UTILITY CUSTOMERS |
| of New Depreciation Rates for its Utility |) | ASSOCIATION, INC.'S FIRST AND |
| Property, Regulatory Asset Accounting |) | SECOND SET OF DATA REQUESTS |
| Treatment for Certain Operating Expenses, and |) | |
| Other Relief |) | |

Piedmont Natural Gas Company, Inc. (“Piedmont”), through counsel, respectfully submits the following general objections to Carolina Utility Customers Association, Inc.’s (“CUCA”) First and Second Set of Data Requests served on Piedmont in the above-captioned docket.

Piedmont generally objects to CUCA’s First and Second Set of Data Requests to the extent that such data requests:

1. Seek to create or impose discovery obligations that exceed the discovery obligations that would otherwise be applicable to Piedmont under the North Carolina Rules of Civil Procedure or that are imposed on Piedmont by any scheduling or other order the North Carolina Utilities Commission (“Commission”) has or may issue in this docket;

2. Seek to create or impose discovery obligations that would result in the affirmative creation, production, or collation of new data, analyses, or studies that are not currently in Piedmont’s possession;

3. Seek the production of materials prepared in anticipation of litigation or that are subject to the Attorney-Client or Attorney-Work Product privileges; and

4. Seek the production of confidential or proprietary information in the absence of an executed non-disclosure agreement between Piedmont and CUCA or protective order issued by the Commission.

Subject to the foregoing general objections, and other possible specific objections that may be applicable to future individual CUCA data requests, Piedmont will produce documents and information in its possession responsive to CUCA's First and Second Set of Data Requests by providing access to such documents and information through a ShareFile link within 10 days of service.

Copies of CUCA's First and Second Set of Data Requests to Piedmont Natural Gas Company, Inc. are attached hereto as Exhibit A and Exhibit B, respectively.

WHEREFORE, Piedmont respectfully submits the foregoing General Objections to the First and Second Set of Data Requests of CUCA in this proceeding.

Respectfully submitted, this the 1st day of July, 2024.

Piedmont Natural Gas Company, Inc.

/s/ James H. Jeffries IV

James H. Jeffries IV

Brian L. Franklin

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**PIEDMONT NATURAL GAS COMPANY, INC.
DOCKET NO. G-9, SUB 837**

EXHIBIT A

**STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH**

DOCKET NO. G-9, SUB 837

In the Matter of
Application of Piedmont Natural Gas)
Company, Inc. for an Adjustment of)
Rates, Charges, and Tariffs Applicable)
to Service in North Carolina,)
Continuation of its IMR Mechanism,)
Adoption of New Depreciation Rates for)
its Utility Property, Regulatory Asset)
Accounting Treatment for Certain)
Operating Expenses, and Other Relief)

CUCA'S
FIRST DATA REQUEST

Carolina Utility Customers Association, Inc. (“CUCA”), by and through its undersigned counsel, hereby serves its First Data Request to Piedmont Natural Gas, Inc. (“Piedmont”) in the above captioned docket.

DATA REQUESTS

1. Provide copies of all data requests served on Piedmont by any party or intervenor in Docket No. G-9, Sub 837, including any requests served by the Public Staff – North Carolina Utilities Commission, together with all responses to the same.

RESPONSE:

Dated: June 26, 2024.



Marcus W. Trathen
Matthew B. Tynan
Christopher B. Dodd
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*Attorneys for Carolina Utility Customers
Association, Inc.*

Certificate of Service

The undersigned, of the law firm of Brooks, Pierce, McLendon, Humphrey & Leonard, L.L.P., hereby certifies that he has served a copy of the foregoing **CUCA First**

Data Request via electronic mail to:

James H. Jeffries IV (jjeffries@mcguirewoods.com)

Brian Franklin (bfranklin@mcguirewoods.com)

Mason Maney (mmaney@mcguirewoods.com)

Brian Heslin (brian.heslin@duke-energy.com)

Pia Powers (pia.powers@duke-energy.com)

This the 26th day of June, 2024.

BROOKS, PIERCE, McLENDON,
HUMPHREY & LEONARD, LLP



Christopher B. Dodd

**PIEDMONT NATURAL GAS COMPANY, INC.
DOCKET NO. G-9, SUB 837**

EXHIBIT B

**STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH**

DOCKET NO. G-9, SUB 837

In the Matter of
Application of Piedmont Natural Gas)
Company, Inc. for an Adjustment of)
Rates, Charges, and Tariffs Applicable)
to Service in North Carolina,)
Continuation of its IMR Mechanism,)
Adoption of New Depreciation Rates for)
its Utility Property, Regulatory Asset)
Accounting Treatment for Certain)
Operating Expenses, and Other Relief)

CUCA'S
SECOND DATA REQUEST

Carolina Utility Customers Association, Inc. ("CUCA"), by and through its undersigned counsel, hereby serves its Second Data Request to Piedmont Natural Gas, Inc. ("Piedmont") in the above captioned docket.

DATA REQUESTS

1. Please provide all exhibits, schedules, and workpapers associated with Piedmont's rate case filing, including all Supplemental documents in "live" EXCEL format.

RESPONSE:

2. If not already provided in Response to CUCA Data Request No. 1, please provide the following in "live" EXCEL format:
 - a. A working version of the class cost-of-service study model;
 - b. Workpapers showing the derivation of delivery revenues at present and proposed rates, including test-year adjusted billing determinants; and
 - c. Workpapers showing the derivation of the peak design day demand for each customer class.

RESPONSE:

3. Please provide a working (i.e., “live” EXCEL) version of the class cost-of-service study provided in Piedmont’s last gas delivery rate case.

RESPONSE:

4. Please explain why Piedmont is not proposing to assign any of the increased delivery revenue requirement to the Municipal and Power Generation contract customers.

RESPONSE:

5. Please explain why Piedmont uses a 50/50 weighting in applying the Peak and Average method.

RESPONSE:

6. Referring to Exhibits KAC-2 and KAC-3, please explain the Cost of Gas Adjustment and, specifically, when this adjustment will be effective and for how long.

RESPONSE:

7. Regarding the proposed Large General Service and Transportation rate design:
 - a. Please explain the rationale for retaining the Monthly charge.
 - b. Please explain the rationale for increasing the Volumetric charges more than the increase in the Demand charges

RESPONSE:

8. Please provide a history of the charges under the Integrity Management Rider (IMR) since the last rate case through April 2024.

RESPONSE:

9. Please provide a projection of the IMR charges for the period May through December 2024.

RESPONSE:

10. If not already provided in Response to CUCA Data Request No. 1, provide copies of all articles and reports cited by Mr. Coyne in his Direct Testimony.

RESPONSE:

11. Provide copies of credit rating agency reports from Moody's and Standard and Poor's for the last three years for Duke Energy and Piedmont.

RESPONSE:

12. Provide Piedmont's actual earned ROE for the years 2019-2023.

RESPONSE:

13. Provide Piedmont's actual capital structure for the years 2019-2023.

RESPONSE:

14. Provide Piedmont's FFO-to-Debt ratios for year ending December 31, 2021, 2022, and 2023. If FFO-to-Debt, as calculated by S&P and Moody's credit rating agencies is not available, please provide an estimate of the ratios. Provide all calculations in Excel format with all formulas and links intact.

RESPONSE:

15. Provide a copy of the latest Blue Chip Financial Forecasts report.

RESPONSE:

16. If not already provided in Response to CUCA Data Request No. 1, provide copies of all articles and reports cited by Mr. Newlin in his Direct Testimony.

RESPONSE:

17. Provide the expected in-service dates for the Eastern Carolina Economic Expansion Project and the new Customer Information System.

RESPONSE:

18. Referring to Piedmont's Southeast Reliability Project:

- a. Provide the expected in-service date.
- b. How many interruptible customers does Piedmont expect to move to firm service after the project is in service?
- c. Why does Piedmont expect Interruptible customers would move to firm service?

RESPONSE:

Dated: June 28, 2024.



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*Attorneys for Carolina Utility Customers
Association, Inc.*

Certificate of Service

The undersigned, of the law firm of Brooks, Pierce, McLendon, Humphrey & Leonard, L.L.P., hereby certifies that he has served a copy of the foregoing **CUCA Second**

Data Request via electronic mail to:

James H. Jeffries IV (jjeffries@mcguirewoods.com)

Brian Franklin (bfranklin@mcguirewoods.com)

Mason Maney (mmaney@mcguirewoods.com)

Brian Heslin (brian.heslin@duke-energy.com)

Pia Powers (pia.powers@duke-energy.com)

This the 28th day of June, 2024.

BROOKS, PIERCE, McLENDON,
HUMPHREY & LEONARD, LLP



Christopher B. Dodd

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing *Objections of Piedmont Natural Gas Company, Inc. to Carolina Utility Customers Association, Inc.'s First and Second Set of Data Requests* is being served this date upon all parties of record electronically or by depositing a copy of the same in the United States Mail, First Class Postage Prepaid, at the address contained in the official service list in this proceeding.

This the 1st day of July, 2024.

/s/ Cindy Maimone
Cindy Maimone