

434 Fayetteville Street Suite 2800 Raleigh, NC 27601

September 21, 2018

VIA ELECTRONIC FILING

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

Re: Docket No. G-9, Sub 726

Dear Ms. Jarvis:

On September 21, 2018, Piedmont Natural Gas Company, Inc. ("Piedmont") filed in this docket a Supplemental Filing in response to the supplemental information requested by the North Carolina Utilities Commission ("Commission") in its *Order Requesting Additional Information Concerning Receipt Interconnect Agreement* ("Order"). By this Filing Optima TH, LLC ("Optima TH") wishes to confirm its position on Piedmont's September 21, 2018 filing in this docket, so that the Commission has the information that it needs to approve the Optima TH Receipt Interconnect Agreement ("Optima TH RIA").

Optima TH concurs with and supports the positions set forth by Piedmont in its Supplemental Filing along with its representations of Optima TH's reasons for agreeing to the use of the version of Appendix F attached to the Optima RIA and a more restrictive initial testing requirement. The form of the Optima TH RIA filed with the Commission includes language that provides for the ultimate revision of the attached Appendix F to comply with the final version of Appendix F and testing requirements approved in Docket No, G-9, Sub 698, given that the design and construction schedule for the Piedmont facilities necessary to connect with the Optima TH facilities is such that both Piedmont and Optima TH anticipate that the final form of Appendix F and the testing requirements will be approved before any of the material provisions of the RIA version of Appendix F become effective.

With respect to the redacted version of the Optima RIA to be filed by Piedmont, Optima TH does not assert any proprietary trade secrets. The proprietary trade secrets to be asserted are Piedmont's.

Finally, Optima TH respectfully requests that the Commission approve the Optima TH RIA at its earliest convenience. so that the design and construction process can begin and Optima TH can complete its project in time to provide relevant information during the pilot period.

North Carolina Utilities Commission September 21, 2018 Page **2** of **2**

Thank you for your assistance with this matter. If you have any questions about this filing, please do not hesitate to contact me.

Very truly yours,

/s/ Deborah K. Ross Deborah K. Ross

Cc: Elizabeth Culpepper

Brian Heslin

James H. Jeffries IV

CERTIFICATE OF SERVICE

I hereby certify that all persons on the service list have been served true and accurate copies of the foregoing Letter to the North Carolina Utilities Commission by hand delivery, first class mail deposited in the U.S. mail, postage pre-paid, or by email transmission to all parties of record.

Respectfully submitted, this the 21st day of September, 2018.

SMITH MOORE LEATHERWOOD LLP

Deborah K Ross

Attorneys for: Optima TH, LLC