

**STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH**

DOCKET NO. G-9, SUB 743

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

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| DOCKET NO. G-9, SUB 743 |) | |
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| In the Matter of |) | ATTORNEY GENERAL'S |
| Application of Piedmont Natural Gas Company, |) | DATA |
| Inc., for an Adjustment of Rates, Charges, and |) | SECOND REQUESTS TO |
| Tariffs Applicable to Service in North Carolina |) | PIEDMONT |
| Continuation of its IMR Mechanism, Adoption |) | REGARDING SETTLEMENT. |
| of an EDIT Rider, and Other Relief |) | 14 August 2019 |

Attorney General Joshua H. Stein, by and through the undersigned attorney, submits the following data request for information and documents concerning the proceeding in the above-referenced docket.

- The requests are continuing, and require supplemental responses as additional or different information is discovered after the initial responses to these data requests.
 - Please state the name and position of the person(s) providing each response.
- (1) Exhibit J to the Stipulation shows a comparison of the end of period revenues to stipulated proposed revenues for each customer class for year 1.
- Please provide a comparison of the end of period revenues to stipulated proposed revenues for each customer class as is done in Exhibit J for year 1, but provide the comparison for year 2, year 3, year 4, and year 5.
- (2) Please provide Exhibit J again, breaking out the amounts and percentages relating to the Excess Deferred Income Taxes in years 1-5.
- (3) Please state how customer rates would be impacted in Year 1 by the following changes to the agreements reflected in the Stipulation filed in this matter on August 12, 2019, and provide your workpapers:
- (a) If federal "unprotected EDIT" is returned to customers over three years instead of five years as reflected in the Stipulation [and corresponding adjustments are made, such as an adjustment to ratebase];
 - (b) If the allowed Return on Equity is 8.7%, instead of the 9.7% provided for in the Stipulation [including the impact on gross up]; and
 - (c) If both changes are made to the Stipulation.

Please provide the impact on rates (i) as a percentage increase in overall rates

compared to existing rates, and (ii) as the changes would impact the average bill of customers by class, both as a percentage and as a dollar amount.

- (4) Please provide Settlement Exhibit PKP-1 showing the impact of the change if the equity ratio in the capital structure changes from 52% to 50% and the percentage of long-term debt is increased to make up the balance in the capital structure.
- (5) Please provide Settlement Exhibit PKP-1 showing the impact of the change if the return on equity is not changed from 10.6% to 9.7% and the equity ratio stays 52%.
- (6) Please provide Settlement Exhibit PKP-1 showing the impact of the change if the return on equity is changed from the settlement 9.7% to 8.7% and the equity ratio stays 52%.

This the 14th day of August 2019.

/s/

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