ERRATA

To:

Chief Clerk's Office

From:

Kim Mitchell

CC:

Date:

September 5, 2019

Re:

Docket Number G-9, Sub 743

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 an EDIT Rider, and Other

Relief.

VOLUME: 6

Please accept for filing the attached corrected pages in the above-mentioned docket and volume. The corrections are as noted below:

Vol. 6, p. 219, line 12 "Mr. Perry" should read "Ms. Perry"

Vol. 6, p. 224, lines 1 and 2 - "CIC" should read "CIAC"

Vol. 6, p. 228, line 8 -"CIC" should read "CIAC"

Vol. 6, page 184, line 5 -"composition" should be "capitalization"

Vol 6, page 90, lines 11-13 – "Robeson Allen G" should be "Robeson LNG"

Vol 6, page 382, line 22 – "Mannus" should be "Maness"

Please distribute the errata and attached pages to all of the parties in the case.

Thank you.

FILED

SEP **05**:2019

Clerk's Office
N.C. Utilities Commission

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- the right to file rate cases when and as they need them, but has there been any discussion in this case between Piedmont and some of the other parties about their anticipation of the next general rate filing?
 - A. Of Piedmont's next general rate filing?
 - Q. Uh-huh.
- A. Yes. We anticipate -- we've talked about that some additional plant investment in the coming years would drive the Company to likely need to file another general rate proceeding.
- Q. And that's the -- specifically the Robeson LNG project?
 - A. The Robeson LNG Facility, yes.
- Q. Okay. And that -- at least currently, we anticipate that that will occur before we ever get to the years four and five of the --
- A. Yes.
- Q. Is that right?
- A. Yes.
 - Q. Okay. Thank you. Could you now turn to -COMMISSIONER GRAY: Could you use that
 microphone a little better, please?
- 23 MR. JEFFRIES: I'm sorry?
- 24 COMMISSIONER GRAY: Speak into it.

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- Q. Did you have a substantial difference of opinion in the methods used and explanations given by Witness Woolridge?
- A. No. I had issues with his adjustment to reduce his ROE based on different capitalization ratios. I feel that method is somewhat tenuous, because relationship to a capital structure and ROE is -- I mean, obviously, if you have more equity in your capital structure, you have less risk, but it's not -- the relationship is not as granular as you might want to think it is. So when he made his transition to recommend the lower end of his ROE range, I could not accept that.

I mean, it's not unreasonable, because my

Iower number is 8.63, but that was has high number, that

was his recommended number. So I have concerns with his

range being in the lower end of the scale. I think it

reflects -- he would determine it as the required

return -- rate of return -- the minimum required rate of

return. And there's reason within that range,

parameters, have you've seen over the years before us,

before you, of witnesses.

Q. Thank you, Mr. Hinton.

COMMISSIONER BROWN-BLAND: Any questions

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of like the old CIAC calculations. Instead of paying the CIAC up front, you do it over time.

We have agreements where it might be a customer that's upgrading its facility and wants to do the same thing, but they're already connected. It might not be as big a construction investment, but they want to pay -- a special contract might be where they want to pay something additional over five years, so they don't have to come out of pocket with the whole thing.

And we have now electric generators in the state, both CCs and CTs, that would be large volume users -- larger volume users -- and a lot of that is the plant investment. And then we need to make sure that the analysis is covering its cost. We have certain assumptions that we use to look at all of these. And similar to feasibility studies we do for residentials, but it's just on a larger scale with different assumptions, but we do the same thing for some other customers as well.

Q. Are any of the special contracts for potential bypasses? So somebody might be a customer of Piedmont, but they have the opportunity to interconnect directly with an interstate pipeline, and, therefore,

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that -- is that every contract has a system benefit, but I think, because we are trying to make sure that those -- the way the contracts are structured, they're more -- there is no unfair advantage, and there's no way to unduly discriminate between different customers.

The fixed charges are, you know, typically held just for plant -- you know, for plant investment and feasible -- just like you would a CIAC, just to connect any water customer with gas customer, and we've done that in the past. But we're -- we just want to make sure that, even though all these contracts that we've had so far do have a benefit built in, they're not all the same, and they're not all structured the same. And I'm sorry, I can't completely answer your question, because I'm getting confidential if I go too deep.

- Q. Okay. Well, let me see if I can -- this might make the confidentiality issue worse, or it may alleviate it to some extent, but --
 - A. Sorry.
- Q. -- in July 2009, in Docket G-9, Sub 568, the Commission issued an order allowing a transportation service agreement for gas between Piedmont and what was then Carolina Power and Light to go into effect. In

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This concludes my summary.

MS. CULPEPPER: The witness is available for cross examination and questions by the Commission.

COMMISSIONER BROWN-BLAND: Is there cross examination for this witness?

 $$\operatorname{MR}.$$ WEST: There is, but the AG has to work something out first.

COMMISSIONER BROWN-BLAND: Mr. West, let's gear up.

CROSS EXAMINATION BY MR. WEST:

- Q. Good afternoon, Ms. Perry, how are you?
- A. Good, thank you.
- Q. In your position as the accounting manager for natural gas and transportation, is part of your role to review the special and electric generation contracts that are presented by Piedmont to the Commission for approval?
- A. Yes, sir. For all special contracts, for all utilities in the state and electric generation contracts.
- Q. And did you have a role in crafting paragraph 32 of the stipulation?
 - A. I did.

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1	COMMISSIONER CLODFELTER: That's all.
2	COMMISSIONER BROWN-BLAND: All right.
3	So we will be sure to receive that as a late-filed
4	exhibit, and when it comes in, it will be received
5	into the record. All right.
6	Now, no questions from the Commission?
7	And no cross examination?
8	Ms. Patel, thank you. You are excused
9	and you may step down.
10	MS. CULPEPPER: That concludes the
11	Public Staff's case.
12	COMMISSIONER BROWN-BLAND: By my
13	account, all the prefiled testimony has already
14	been received into evidence. We have the
15	application and stipulation into evidence. Any
16	other matters that we might be overlooking?
17	(No response.)
18	COMMISSIONER BROWN-BLAND: All right.
19	MS. HARROD: I'm sorry, Madam Chair.
20	COMMISSIONER BROWN-BLAND: Yes,
21	Ms. Harrod.
22	MS. HARROD: Mr. Maness was kind enough
23	to let me know that, when I asked the Commission to
24	take judicial notice of the Dominion rate case