



**NORTH CAROLINA
PUBLIC STAFF
UTILITIES COMMISSION**

August 24, 2021

Ms. A. Shonta Dunston, Chief Clerk
North Carolina Utilities Commission
4325 Mail Service Center
Raleigh, North Carolina 27699-4300

Re: Docket No. G-9, Sub 722 – Petition for Consolidated Construction/Redelivery Agreement; G-9, Sub 781 – Application for General Rate Increase; and G-9, Sub 786 – Application of Piedmont Natural Gas Company, Inc., for Modifications to Existing Energy Efficiency Program and Approval of New Energy Efficiency Programs

Dear Ms. Dunston:

Attached for filing in the above-referenced dockets is the supplemental testimony of Dustin R. Metz, Utilities Engineer, Electric Section, Energy Division. Piedmont Natural Gas Company, Inc., has consented to the filing of this supplemental testimony.

By copy of this letter, we are forwarding a copy to all parties of record.

Sincerely,

Electronically submitted
s/ Elizabeth D. Culpepper
Staff Attorney
elizabeth.culpepper@psncuc.nc.gov

s/ Megan Jost
Staff Attorney
megan.jost@psncuc.nc.gov

Attachment

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BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

DOCKET NO. G-9, SUB 722
DOCKET NO. G-9, SUB 781
DOCKET NO. G-9, SUB 786

DOCKET NO. G-9, SUB 722)
)
In the Matter of)
Consolidated Natural Gas Construction)
and Redelivery Services Agreement)
Between Piedmont Natural Gas)
Company, Inc., and Duke Energy)
Carolinas, LLC)
)
DOCKET NO. G-9, SUB 781)
)
In the Matter of) SUPPLEMENTAL
Application of Piedmont Natural Gas) TESTIMONY OF
Company, Inc., for an Adjustment of) DUSTIN R. METZ
Rates, Charges, and Tariffs Applicable) PUBLIC STAFF – NORTH
to Service in North Carolina) CAROLINA UTILITIES
) COMMISSION
DOCKET NO. G-9, SUB 786)
)
In the Matter of)
Application of Piedmont Natural Gas)
Company, Inc., for Modification to)
Existing Energy Efficiency Program)
and Approval of New Energy Efficiency)
Programs)

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

**DOCKET NO. G-9, SUB 722
DOCKET NO. G-9, SUB 781
DOCKET NO. G-9, SUB 786**

SUPPLEMENTAL TESTIMONY OF DUSTIN R. METZ

**ON BEHALF OF THE PUBLIC STAFF
NORTH CAROLINA UTILITIES COMMISSION**

AUGUST 24, 2021

- 1 **Q. PLEASE STATE YOUR NAME AND ADDRESS FOR THE**
2 **RECORD.**
- 3 A. My name is Dustin R. Metz. My business address is 430 North
4 Salisbury Street, Dobbs Building, Raleigh, North Carolina.
- 5 **Q. WHAT IS YOUR POSITION WITH THE PUBLIC STAFF?**
- 6 A. I am an engineer in the Electric Section – Operations and Planning
7 in the Public Staff’s Energy Division.
- 8 **Q. ARE YOU THE SAME DUSTIN R. METZ WHO FILED TESTIMONY**
9 **IN THIS PROCEEDING ON AUGUST 11, 2021?**
- 10 A. Yes.
- 11 **Q. WHAT IS THE PURPOSE OF YOUR SUPPLEMENTAL**
12 **TESTIMONY IN THIS PROCEEDING?**
- 13 A. The purpose of my supplemental testimony is to modify the pro forma
14 allocation that I proposed in my original testimony.

1 **Q. WHAT IS YOUR PROPOSED MODIFICATION?**

2 A. For purposes of this rate case, I recommend the continued use of the
3 Company's proposed North Carolina Allocation of 85.39% applied to
4 the demand allocation. I have provided this correction to Public Staff
5 witnesses Perry and Patel, and it is my understanding that both
6 witnesses will incorporate the correction in future filings. The
7 correction will eliminate the Design Day Allocation Change
8 adjustment reflected on Line 8 of Perry Exhibit I, Schedule 1 filed on
9 August 11, 2021.

10 **Q. WHY YOU ARE NOW PROPOSING THIS CORRECTION TO**
11 **YOUR ORIGINAL TESTIMONY?**

12 A. My initial analysis evaluated firm sales (FS) customers only, based
13 on my erroneous understanding at the time that the pro forma
14 allocation was applied to the total "cost of gas" (both commodity and
15 demand) and the Liquefied Natural Gas (LNG) accounts. The cost of
16 gas, for the purposes of this allocation, should have been limited to
17 the demand cost component. Both FS and firm transportation (FT)
18 usage must be factored into the demand allocation, but my initial
19 analysis excluded FT and, therefore, it was incorrect. However, I still
20 recommend a study to review the appropriateness of the Company's
21 "regression-based" analysis and to evaluate the possibility of using
22 alternative methods in future rate cases.

- 1 Q. DOES THIS COMPLETE YOUR SUPPLEMENTAL TESTIMONY?
- 2 A. Yes.