

**STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH**

DOCKET NO. G-9, SUB 743

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

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)	
an EDIT Rider, and Other Relief)	
		MOTION TO SUPPLEMENT THE RECORD

NOW COMES THE PUBLIC STAFF – North Carolina Utilities Commission (Public Staff), by and through its Executive Director, Christopher J. Ayers, and respectfully moves the Commission to supplement the record in this proceeding by allowing the Public Staff to substitute the Revised Attorney General’s Office – Powers Cross Exhibit 5 attached hereto. The purpose of the requested substitution is to correct errors in Attorney General’s Office – Powers Cross Exhibit 5. In support of this Motion, the Public Staff respectfully shows the Commission as follows:

1. On August 14, 2019, the Attorney General’s Office submitted a data request to the Public Staff (AG Settlement Data Request) regarding the Stipulation entered into by Piedmont Natural Gas Company, Inc. (Piedmont), the Public Staff, Carolina Utility Customers Association, Inc. (CUCA), and Carolina Industrial Group for Fair Utility Rates IV (CIGFUR IV), which was filed in this docket on August 13, 2019.

2. Item 3 of the AG Settlement Data Request requested the following:

Please provide Patel Exhibit III (which shows the Public Staff recommended margin changes and flowback of EDIT for Year 1 and Year 2), but instead of the Public Staff recommendation, show the Settlement margin changes and flowback of EDIT.

3. On August 17, 2019, the Public Staff responded to Item 3 of the AG Settlement Data Request. The Public Staff's response to Item 3 was subsequently utilized by the Attorney General's Office during the evidentiary hearing of this matter as Attorney General's Office – Powers Cross Exhibit 4 and Attorney General's Office – Powers Cross Exhibit 5.

4. During the evidentiary hearing, Commissioner Clodfelter requested that the Public Staff file a late-filed exhibit extending the calculations of change in margin and flowback of EDIT set out in Attorney General's Office – Powers Cross Exhibit 5 to the fourth, fifth, and sixth years following the effective date of the rates agreed to in the Stipulation.

5. While preparing the late-filed exhibit, the Public Staff identified a number of errors in Attorney General's Office – Powers Cross Exhibit 5. These errors relate to rounding differences, linking data from an incorrect source, and figures that were keyed in, instead of being linked to calculations in the source spreadsheet.

6. The Public Staff believes that the errors it has identified should be corrected in the record of this proceeding to ensure that the figures set out in both Attorney General's Office – Powers Cross Exhibit 5 and the to-be-filed late-filed exhibit requested by the Commission are correct. Accordingly, the Public Staff respectfully seeks Commission authorization to make such corrections through acceptance of the Revised Attorney General's Office –

Powers Cross Exhibit 5 attached hereto as a supplement to the record in this docket.

7. The Public Staff's undersigned counsel has consulted with counsel for the other parties regarding the relief requested herein and is authorized to represent to the Commission that Piedmont, CUCA, the Attorney General's Office, Nucor Steel-Herford, and Fayetteville Public Works Commission have no objection. The Public Staff has not received a response from counsel for CIGFUR IV.

8. Based on the foregoing, the Public Staff respectfully requests that the Commission allow the record in this proceeding to be supplemented by accepting the Revised Attorney General's Office – Powers Cross Exhibit 5 attached hereto.

WHEREFORE, the Public Staff respectfully requests that the Commission enter an order approving this motion to supplement the record in this docket and accepting the Revised Attorney General's Office – Powers Cross Exhibit 5 attached hereto.

Respectfully submitted, this the 11th day of September, 2019.

PUBLIC STAFF
Christopher J. Ayers
Executive Director

David T. Drooz
Chief Counsel

Electronically submitted
/s/ Elizabeth D. Culpepper
Staff Attorney

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CERTIFICATE OF SERVICE

I do hereby certify that I have this day served a copy of the foregoing upon each of the parties of record in this proceeding or their attorneys of record by emailing them an electronic copy or by causing a paper copy of the same to be hand-delivered or deposited in the United States Mail, postage prepaid, properly addressed to each.

This the 11th day of September, 2019.

Electronically submitted
/s/ Elizabeth D. Culpepper

Revised Patel Exhibit III

Piedmont Natural Gas Company, Inc.

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STIPULATED

MARGIN CHANGES AND FLOWBACK OF EDIT

Rate Schedule	Change in Margin		Flow Back of EDIT	
	(\$)	(%)	Year 1 (\$)	Years 2-3 (\$)
101	\$68,521,683	14.7%	(\$52,300,325)	(\$28,528,165)
102	32,775,300	14.7%	(20,571,610)	(11,220,878)
152	4,978,853	14.7%	(3,734,969)	(2,037,256)
142	129,812	14.7%	(59,149)	(32,263)
103	56,913	0.4%	(161,284)	(87,833)
104	24,773	0.6%	(54,639)	(29,819)
113	1,337,580	4.7%	(1,960,002)	(1,067,390)
114	892,419	3.9%	(1,809,611)	(987,589)
<u>T-10</u>	<u>77,946</u>	<u>3.4%</u>	<u>(84,361)</u>	<u>(45,942)</u>
Overall	\$108,795,279	13.7%	(\$80,735,950)	(\$44,037,134)

Rate Schedule	Combined Margin & Flow Back of EDIT			
	Year 1 (Nov'19 - Oct'20)		Years 2-3 (Nov'20 - Oct'22)	
	(\$)	(%)	(\$)	(%)
101	\$16,221,358	3.5%	\$39,993,517	8.6%
102	12,203,690	5.5%	21,554,422	9.7%
152	1,243,884	3.7%	2,941,597	8.7%
142	70,663	8.0%	97,549	11.1%
103	(104,371)	-0.8%	(30,920)	-0.2%
104	(29,866)	-0.8%	(5,046)	-0.1%
113	(622,422)	-2.2%	270,191	0.9%
114	(917,192)	-4.0%	(95,170)	-0.4%
<u>T-10</u>	<u>(6,414)</u>	<u>-0.3%</u>	<u>32,005</u>	<u>1.4%</u>
Overall	\$28,059,329	3.5%	\$64,758,145	8.2%