

STATE OF TENNESSEE

Office of the Attorney General



HERBERT H. SLATERY III
ATTORNEY GENERAL AND REPORTER

P.O. BOX 20207, NASHVILLE, TN 37202
TELEPHONE (615)741-3491
FACSIMILE (615)741-2009

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VIA ELECTRONIC FILING

Paul S. Davidson, Eq.
Waller Lansden Dortch & Davis, LLP
511 Union Street Suite 2700
P.O. Box 198966
Nashville, TN 37219-8966

James H. Jeffries, IV, Esq.
McGuire Woods, LLP
201 North Tyron Street, Suite 3000
Charlotte, NC 28202

Re: Tennessee Public Utility Commission, Docket No. 20-00047, *Emergency Petition to Suspend Service Disconnections*

Dear Mr. Davidson and Mr. Jeffries:

The Consumer Advocate Unit in the Financial Division of the Office of the Tennessee Attorney General (Consumer Advocate) continues to monitor the responses to the Tennessee Public Utility Commission's (TPUC) requests for information by regulated public utilities, including those of Piedmont Natural Gas, Inc. (Piedmont). On June 2, 2020, Piedmont submitted a weekly filing.

The Consumer Advocate appreciates Piedmont's acknowledgment that that service disconnections "will only be performed pursuant to future authorization granted by the TPUC."¹ However, in this weekly report, Piedmont states that it "has begun to contact customers with past due balances to offer flexible deferred payment arrangements in order to avoid future disconnections of service. The Company will also send informational emails to its residential and small general service customers to raise awareness of payment arrangement options."²

Letter to Piedmont Natural Gas, Inc.
TPUC Docket No. 20-00047
June 4, 2020

Without seeing copies of the Company's correspondence with customers, the Consumer Advocate is concerned that Piedmont's contact about past due balances may lead to increased stress and confusion for the customers that Piedmont serves since TPUC directed in its *Order Requiring All Jurisdictional Utilities to Suspend Actions to Disconnect Service for Lack of Payment During the State of Public Health Emergency*, the Commission stated that "this order shall continue in effect, at a minimum, until the public health emergency declared on March 12, 2020 expires or is terminated by Governor Lee; at which time the Commission shall consider whether further action is warranted."³

The Consumer Advocate requests that Piedmont file a copy of (1) its correspondence with customers with past due balances to offer flexible deferred payment arrangements in order to avoid future disconnections of service, and (2) its proposed informational emails to its residential and small general service customers to raise awareness of payment arrangement options as part of Docket 20-00047.

We appreciate your time and attention to this inquiry. I hope that you remain well.

Sincerely,



Karen H. Stachowski
Assistant Attorney General

cc: TPUC Docket No. 20-00047
Kelly Cashman Grams, TPUC
David Foster, TPUC

¹ Piedmont Natural Gas, Inc. COVID-19 Response Update Week of June 1, 2020 (June 2, 2020).

² *Id.*

³ *Order Requiring All Jurisdictional Utilities to Suspend Actions to Disconnect Service for Lack of Payment During the State of Public Health Emergency* at 11, Tennessee Public Utility Commission (March 31, 2020) (emphasis added).