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July 15, 2020

Via U.S. Mail and Email

Executive Director Earl Taylor
c/o Ectory Lawless
Tennessee Public Utility Commission
502 Deaderick Street, Fourth Floor
Nashville, Tennessee 37243

**Re: Piedmont Natural Gas Company, Inc. Integrity Management
Rider Monthly Report; Docket No.: 20-00047**

Dear Mr. Taylor:

Enclosed is Piedmont Natural Gas Company, Inc.'s ("Piedmont" or the "Company") Response to the Commission Staff's Data Request issued on June 30, 2020 in the above-referenced docket.

This material is also being filed today by way of email to the Tennessee Public Utility Commission docket manager, Ectory Lawless. Please file the original of each and provide us a "filed" stamped copy of each via email to denise.guye@wallerlaw.com.

Very truly yours,



Paul S. Davidson

Enclosures

cc: Bruce Barkley
Pia Powers
Eddie Davidson
Michelle Mairs
Alex Bradley
Daniel Whitaker
James Jeffries

PIEDMONT NATURAL GAS COMPANY, INC.
DOCKET NO. 20-00047
Emergency Petition To Suspend Service Disconnections
COMMISSION STAFF DATA REQUEST
Date Issued: June 30, 2020
Date Due: July 15, 2020

1. Should the moratorium on disconnects for nonpayment be lifted? If the moratorium should not be lifted at this time, when should the moratorium be lifted? Please explain your answer.

RESPONSE: Piedmont Natural Gas Company, Inc. (“Piedmont” or “Company”) believes that the moratorium on natural gas customer disconnections for non-payment should be consistent with the expiration of the Governor’s Executive Order 50. After the moratorium is lifted by the Commission, Piedmont will provide customers with one full billing cycle’s notice prior to resumption of disconnection for non-payment and application of late fees. The Company has and will continue to accommodate the needs of customers during the moratorium, and beyond the moratorium, by offering extended and flexible payment plan arrangements. Piedmont in no way intends to pressure customers into payment arrangements, however, customers who allow unpaid balances to grow excessively are less likely to be able to afford those outstanding balances at a later date. An announcement of the end to the moratorium at the appropriate time would provide the motivation for customers to begin working with Piedmont on arrangements. It is important to note that there are large pools of assistance dollars being made available through federal programs and other sources, and Piedmont’s customers should be encouraged to access that assistance before funding is depleted. The best way for customers to ensure they can access those funds is to work with Piedmont on payment arrangements.

2. Did you continue to accrue late charges for delinquent accounts during the moratorium period?

RESPONSE: No.

3. Should late charges accrued during the moratorium period be billed to delinquent customers once the moratorium is lifted?

RESPONSE: No.

4. If late charges accrued during the moratorium period are not collected from delinquent customers, do you plan to seek recovery of such charges from customers through other means? If so, please describe the mechanism you propose to recover late charges accrued during the moratorium period.

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RESPONSE: Piedmont currently has no plans to request such recovery. If the pandemic persists and the Company subsequently requests regulatory relief from the Commission concerning this shortfall or any other financial impacts of the pandemic, Piedmont will fully describe the mechanism and provide supporting documentation at such time.

5. For each customer class, please provide the (i) total number, (ii) aggregate amount excluding late charges, (iii) aggregate amount of accrued late charges, and (iv) average days overdue of delinquent accounts for each month beginning January 2020 through the most recent month the information is available at the time of your response.

RESPONSE: See table below.

	Residential	Other
Total No. of Accounts	172,537	18,320
Amount Ex. Late Charges	\$3,982,811	\$3,425,954
Accrued Late Charges	\$30,798	\$7,937
Average Days Overdue	60	61

6. For each customer class, please provide the aggregate amount of delinquent customer accounts written off to bad debt expense for each month beginning January 2020 through the most recent month the information is available at the time of your response.

RESPONSE: Total amounts written off are follows:

January - \$14,807

February - \$18,696

March - \$23,808

April - \$77,216

May - \$69,010

June - \$25,039

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7. In the event the moratorium on customer disconnects for nonpayment is lifted, please describe the process you propose to use to commence disconnections for nonpayment. Notwithstanding current Commission rules and company tariffs, please include in your description the length of customer notice that should be given prior to disconnection of service, as well as availability of customer service representatives to address customer concerns or complaints regarding disconnection or potential disconnection of their service.

RESPONSE: As stated in the response to Question 1 above, Piedmont will provide customers with one full billing cycle's notice prior to resumption of disconnection for non-payment and application of late fees. The Company has developed self-service tools that customers can use to set up extended payment arrangements without needing to talk to a customer service representative, freeing our representatives to address specific customer concerns or complaints and to assist with deferred payment arrangements for those customers who are not comfortable with the self-service option.

8. In the event the moratorium is lifted and the customer is unable to promptly pay overdue amounts to bring their account current within a reasonable notice period, please describe the programs, arrangements, or payment plans, if any, that you would propose to permit customers to maintain their service while paying past due balances over a reasonable time. Please state whether you would propose to apply late charges, or assess interest charges, on the unpaid balances of such arrangements provided the customer is keeping their payments current.

RESPONSE: The Company's residential and nonresidential customers may enter into deferred payment arrangements of three or six months to pay off arrearages accumulated during the moratorium period. The Company will provide flexibility in the event alternate durations are requested. Service will be maintained while customers pay past due balances, and no late fees or interest charges will be applied so long as customers enter into extended payment arrangements.

Responses provided by Piedmont on July 15, 2020.