



March 20, 2020

David Foster  
Utilities Division Director  
Tennessee Public Utility Commission  
502 Deaderick Street, 4<sup>th</sup> Floor  
Nashville, Tennessee 37243

RE: Tariff Waivers for the pandemic outbreak of novel coronavirus COVID-19

Dear Mr. Foster,

Enclosed is a new tariff sheet for Piedmont Natural Gas Company, Inc. ("Piedmont" or "Company"). This tariff sheet reflects certain requirements of which the Company is seeking limited, temporary waiver.

Piedmont requests expedited approval of these waivers intended to benefit our customers for the duration of the public health emergency declared as a result of the pandemic outbreak of novel coronavirus COVID-19. On March 12, 2020, Governor Bill Lee issued Executive Order No. 14 instituting emergency measures aimed to prevent and contain the spread of COVID-19. A national public health emergency has also been declared by Donald J. Trump, President of the United States.

Piedmont remains committed to serving its customers with safe and reliable natural gas utility service, and the health and well-being of our customers, employees, and the communities we serve are paramount. Piedmont keeps robust business continuity plans, referred to as Continuity of Operations plans, to ensure critical functions continue operating under a broad range of circumstances. These include all-hazard emergencies, national security emergencies and natural, man-made and technological threats. Piedmont recently completed a Continuity of Operations review of the critical functions needed to serve the energy needs of our customers. The review focused on human resource contingencies, information technology, supply chain, operational readiness, safety, environmental compliance, customer communications and public information. We are not seeing significant impacts to our supply chain at this time, and it remains stable. We are prepared to rotate suppliers if needed. Similar to most large companies and organizations, we continue to monitor and order critical cleaning supplies, recognizing hospitals and medical systems are the national priority. Interstate and local natural gas delivery systems are operating effectively. We are aware that email phishing attempts and other scams related to the coronavirus are on the rise, and we are reminding workers to be vigilant and avoid clicking on any suspicious links or opening emails from unknown senders.

**Notification of Piedmont's Decision to Cease Disconnections for Non-Payment**

To ensure that our customers will not have the additional worry about having their natural gas service disconnected for non-payment during this time of financial uncertainty, please be aware that Piedmont has not disconnected any customer's service for non-payment during this pandemic and will not disconnect any customer's service for non-payment through the duration of the public health emergency. Piedmont will continue to read meters and send bills, but this action will give customers experiencing financial hardship extra time to make payments. Because of the financial challenges that our customers, such as families and small businesses, may experience because of the pandemic, this temporary policy applies to both residential and non-residential customers alike.

**Request for Expedited Approval to Waive Gross Billing Charges, Returned Check Charges and Reconnection Charges Incurred by Customers**

**Gross Billing Charges and Returned Check Charges**

Consistent with the terms of its tariff, Piedmont is authorized to render gross billing charges to customers who do not pay their bills by the due date. Because of the pandemic, however, Piedmont is aware that our customers may not be able to always pay their bills on time. To prevent the added burden of gross billing charges on these customers, Piedmont requests authority to begin waiving gross billing charges to all customers for the duration of this public health emergency. Therefore, Piedmont respectfully request that the Commission issue an expedited order authorizing this waiver effective March 21, 2020.

Piedmont also seeks to further mitigate the financial impacts of this pandemic on their residential and non-residential customers by requesting authority to waive the application of charges for checks returned for insufficient funds, effective March 21, 2020 through the duration of this public health emergency.

**Reconnection Charges**

For those Piedmont customers whose service was recently disconnected for nonpayment, the Company requests authority to waive the reconnection charge when any such residential or non-residential customer seeks to have service restored. Piedmont requests this waiver effective March 21, 2020 through the duration of this public health emergency. Piedmont will work with customers regarding the other requirements to restore service, including re-establishment of credit and payment arrangements on arrears amounts.

**Conclusion**

Based on the foregoing, Piedmont respectfully requests that the Commission issue an order on the requested waivers with an effective date of March 21, 2020

If additional information or clarification is needed, please do not hesitate to contact me.

Sincerely,

/s/ Pia Powers

Pia Powers

Managing Director - Gas Rates & Regulatory

Enclosure

Cc: Michelle Mairs  
Bruce Barkley  
Eddie Davidson  
Jim Jeffries

**ENCLOSURE:**  
**PROPOSED TARIFF WAIVERS**  
**EFFECTIVE MARCH 21, 2020**

## **TARIFF WAIVERS**

### **Section 2**

The tariff waivers herein were requested in the Company's March 20, 2020 filing with the TPUC.

#### **RATE SCHEDULE NO. 301**

##### **Residential Service**

###### **PAYMENT TERMS**

All bills for service are due upon presentation and the net rates are applicable if payment is made on or before the last date of payment stated on the bill. Payments made after that date shall be for the gross amount which is greater by five percent (5%) than the net billing.

###### **RETURNED CHECK CHARGE**

In the event a Customer's check for payment is returned to the Company marked NSF (Non Sufficient Funds) the Customer will be assessed a charge of \$20.00.

*Waiver from billing of gross amount and returned check charge is effective beginning March 21, 2020 through the duration of the public health emergency referenced in Executive Order No. 14.*

#### **RATE SCHEDULE NO. 302**

##### **Small General Service**

###### **PAYMENT TERMS**

All bills for service are due upon presentation and the net rates are applicable if payment is made on or before the last date of payment stated on the bill. Payments made after that date shall be for the gross amount which is greater by five percent (5%) than the net billing.

###### **RETURNED CHECK CHARGE**

In the event a Customer's check for payment is returned to the Company marked NSF (Non Sufficient Funds) the Customer will be assessed a charge of \$20.00.

*Waiver from billing of gross amount and returned check charge is effective beginning March 21, 2020 through the duration of the public health emergency referenced in Executive Order No. 14.*

#### **RATE SCHEDULE NO. 303**

##### **Large General Sales Service**

###### **PAYMENT TERMS**

All bills for service are due upon presentation and the net rates are applicable if payment is made on or before the last date of payment stated on the bill. Payments made after that date shall be for the gross amount which is greater by five percent (5%) than the net billing.

**RETURNED CHECK CHARGE**

In the event a Customer's check for payment is returned to the Company marked NSF (Non Sufficient Funds) the Customer will be assessed a charge of \$20.00.

*Waiver from billing of gross amount and returned check charge is effective beginning March 21, 2020 through the duration of the public health emergency referenced in Executive Order No. 14.*

**RATE SCHEDULE NO. 304**  
**Interruptible General Sales Service**

**PAYMENT TERMS**

All bills for service are due upon presentation and the net rates are applicable if payment is made on or before the last date of payment stated on the bill. Payments made after that date shall be for the gross amount which is greater by five percent (5%) than the net billing.

**RETURNED CHECK CHARGE**

In the event a Customer's check for payment is returned to the Company marked NSF (Non Sufficient Funds) the Customer will be assessed a charge of \$20.00.

*Waiver from billing of gross amount and returned check charge is effective beginning March 21, 2020 through the duration of the public health emergency referenced in Executive Order No. 14.*

**RATE SCHEDULE NO. 309**  
**Special Availability Service**

**PAYMENT TERMS**

All bills for service are due upon presentation and the net rates are applicable if payment is made on or before the last date of payment stated on the bill. Payments made after that date shall be for the gross amount which is greater by five percent (5%) than the net billing.

**RETURNED CHECK CHARGE**

In the event a Customer's check for payment is returned to the Company marked NSF (Non Sufficient Funds) the Customer will be assessed a charge of \$20.00.

*Waiver from billing of gross amount and returned check charge is effective beginning March 21, 2020 through the duration of the public health emergency referenced in Executive Order No. 14.*

**RATE SCHEDULE NO. 310**  
**Resale Service**

**PAYMENT TERMS**

All bills for service are due upon presentation and the net rates are applicable if payment is made on or before the last date of payment stated on the bill. Payments made after that date shall be for the gross amount which is greater by five percent (5%) than the net billing.

**RETURNED CHECK CHARGE**

In the event a Customer's check for payment is returned to the Company marked NSF (Non Sufficient Funds) the Customer will be assessed a charge of \$20.00.

*Waiver from billing of gross amount and returned check charge is effective beginning March 21, 2020 through the duration of the public health emergency referenced in Executive Order No. 14.*

**RATE SCHEDULE NO. 313**

**Firm Transportation Service**

**PAYMENT TERMS**

All bills for service are due upon presentation and the net rates are applicable if payment is made on or before the last date of payment stated on the bill. Payments made after that date shall be for the gross amount which is greater by five percent (5%) than the net billing.

**RETURNED CHECK CHARGE**

In the event a Customer's check for payment is returned to the Company marked NSF (Non Sufficient Funds) the Customer will be assessed a charge of \$20.00.

*Waiver from billing of gross amount and returned check charge is effective beginning March 21, 2020 through the duration of the public health emergency referenced in Executive Order No. 14.*

**RATE SCHEDULE NO. 314**

**Interruptible Transportation Service**

**PAYMENT TERMS**

All bills for service are due upon presentation and the net rates are applicable if payment is made on or before the last date of payment stated on the bill. Payments made after that date shall be for the gross amount which is greater by five percent (5%) than the net billing.

**RETURNED CHECK CHARGE**

In the event a Customer's check for payment is returned to the Company marked NSF (Non Sufficient Funds) the Customer will be assessed a charge of \$20.00.

*Waiver from billing of gross amount and returned check charge is effective beginning March 21, 2020 through the duration of the public health emergency referenced in Executive Order No. 14.*

**RATE SCHEDULE NO. 343**

**Motor Vehicle Fuel Service**

**PAYMENT TERMS**

All bills for service are due upon presentation and the net rates are applicable if payment is made on or before the last date of payment stated on the bill. Payments made after that date shall be

for the gross amount which is greater by five percent (5%) than the net billing.

**RETURNED CHECK CHARGE**

In the event a Customer's check for payment is returned to the Company marked NSF (Non Sufficient Funds) the Customer will be assessed a charge of \$20.00.

*Waiver from billing of gross amount and returned check charge is effective beginning March 21, 2020 through the duration of the public health emergency referenced in Executive Order No. 14.*

**RATE SCHEDULE NO. 352**

**Medium General Service**

**PAYMENT TERMS**

All bills for service are due upon presentation and the net rates are applicable if payment is made on or before the last date of payment stated on the bill. Payments made after that date shall be for the gross amount which is greater by five percent (5%) than the net billing.

**RETURNED CHECK CHARGE**

In the event a Customer's check for payment is returned to the Company marked NSF (Non Sufficient Funds) the Customer will be assessed a charge of \$20.00.

*Waiver from billing of gross amount and returned check charge is effective beginning March 21, 2020 through the duration of the public health emergency referenced in Executive Order No. 14.*

**SERVICE REGULATIONS**

**Section 6 - Rules and Regulations Governing Supply & Consumption of Gas**

11. The Company will charge \$55.00 during the months of February through August and \$85 for the months of September through January for turning on a meter for an existing consumer or member of the same family or household at same address. This charge applies only to those consumers who have previously elected to have the meter turned off without discontinuing service or whose account has been closed because of non-payment of a bill.

12. In the event gas is shut off because of consumer's failure to pay, a charge will be made for each restoration. The Company will charge \$55.00 during the months of February through August and \$85 for the months of September through January plus payment of past due gas bills for turning on meters shut off for non-payment of bill. The Company will not be liable for damages for shutting off gas or for delay in restoring service. An additional deposit may also be required.

*Waiver from billing of the reconnection fee for customers previously disconnected for non-payment is effective beginning March 21, 2020 through the duration of the public health emergency referenced in Executive Order No. 14.*