



March 24, 2020

Chair Robin L. Morrison
Tennessee Public Utilities Commission
502 Deaderick Street, 4th Floor
Nashville, TN 37243-0001

Dear Chair Morrison:

Piedmont Natural Company, Inc. hereby files its response to the Tennessee Public Utilities Commission's Ongoing Request For Information Related to Measures Taken During The Coronavirus Covid-19 Public Health Emergency. Our response is being filed electronically at TPUC.DocketRoom@tn.gov as directed.

Please contact me at any time if the Commission or Commission Staff have any questions or comments.

Sincerely,

/s/ Bruce P. Barkley

Bruce P. Barkley
VP – Rates and Natural Gas Supply
Piedmont Natural Gas
704.731.4699
bruce.barkley@duke-energy.com



**PIEDMONT NATURAL GAS COMPANY, INC.
RESPONSE TO INFORMATION REQUESTED BY THE TENNESSEE PUBLIC UTILITIES COMMISSION
MARCH 24, 2020**

Piedmont Natural Gas Company, Inc. ("Piedmont" or "the Company") hereby provides an update concerning its emergency operational and response plans and measures taken in order to ensure the continued delivery of safe and reliable natural gas service to its customers in Tennessee during the ongoing pandemic.

Customer-Focused Initiatives

Piedmont has taken several proactive steps to help mitigate impacts to customers that may result from the current health crisis, including the following:

- Suspended customer disconnections for non-payment, which gives customers who may experience financial hardships extra time to make payments while the Company continues to read meters and send bills;
- Encouraged customers who are able to pay to do so in order to avoid building up large balances;
- Requested Tennessee Public Utilities Commission ("TPUC") approval of waiver of gross billing charges associated with late payments and waiver of returned check charges, effective March 21 and continuing throughout the State's health emergency;
- Requested TPUC approval to waive reconnection fees for customers who were disconnected for nonpayment in the days leading up to the State's health emergency;
- Offered flexible payment arrangements to customers during this period of uncertainty;
- Taken steps to protect the health and safety of our customers to help reduce the spread of the COVID-19 virus. For example, the Company is limiting employee direct interactions with customers by suspending discretionary work that could have required an in-home visit.

Reliability and Operations

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 maintains 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 currently, and it remains stable. We are prepared to rotate suppliers if needed. Like most large companies and organizations, we continue to monitor and order critical cleaning supplies, recognizing hospitals and medical systems are the national priority. 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.

As stated previously, certain tasks are being deferred. These include almost all work on the customers' side of the meter except for leaking water heaters and other non-essential work such as routine meter changeouts and relocations. Procedures for use of personal protective equipment and social distancing have been established for interactions with customers.

Piedmont is actively participating in Duke Energy's Incident Command System to coordinate the response to COVID-19 across the enterprise. Further, we are maintaining close contact with our interstate pipeline suppliers. At this time, both the interstate pipeline system and Piedmont's natural gas distribution system in Tennessee are operating effectively.

Employee Matters

The Company is taking a variety of measures to protect employee health, including dividing essential work teams to different locations where possible, conducting thermal monitoring and screening at priority sites, practicing social distancing with coworkers, and implementing remote working for those who can. Non-essential travel and in person meetings have been suspended. We have also experienced numerous employee impacts from schools and daycares closing. Our employees are critical to providing continued service so we are looking at ways we can help them through these times with flexible scheduling, additional paid time off to deal with dependent care, and a stipend for employees below a certain pay threshold.

Charitable Contributions

In addition to the \$200,000 in charitable pledges made as a result of the recent tornadoes that struck the greater Nashville area, Piedmont has committed \$10,000 to relief organizations in its Tennessee service territory as a result of hardships related to the ongoing pandemic.