STATE OF NORTH CAROLINA UTILITIES COMMISSION RALEIGH

DOCKET NO. G-40, SUB 145

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of
Application of Frontier Natural Gas)
Company for Annual Review of Gas Costs) PUBLIC STAFF'S MOTION
Pursuant to G.S. 62-133.4(c) and) FOR EXTENSION OF TIME
Commission Rule R1-17(k)(6))

NOW COMES THE PUBLIC STAFF – North Carolina Utilities Commission (Public Staff), by and through its Executive Director, Christopher J. Ayers, and moves that the Commission issue an order granting the Public Staff, other intervenors, and Frontier Natural Gas Company (Frontier) additional time to file testimony in the above-captioned docket. In support of this motion, the Public Staff respectfully shows unto the Commission:

- 1. This is Frontier's annual gas cost review proceeding in which the Commission receives testimony and rules on the prudence of Frontier's incurrence of gas costs for the 12 months ended September 30, 2017, and the propriety of its accounting for such costs during such period.
- 2. On December 1, 2017, Frontier prefiled the testimony and exhibits of Fred A. Steele attesting to the prudence of Frontier's gas costs during the review period and the propriety of its accounting for such costs.
- 3. On December 6, 2017, the Commission issued its Order Scheduling Hearing, Requiring Filing of Testimony, Establishing Discovery Guidelines and Requiring Public Notice (Order).

- 4. The Order specified that the Public Staff and other intervenors shall file direct testimony and exhibits on or before February 19, 2018, and also provided that Frontier shall file its rebuttal testimony and exhibits within 10 days of the actual receipt of the testimony of the party to whom the rebuttal is addressed.
- 5. The Public Staff has been working diligently on this matter; however, it will not be in a position to file testimony and exhibits by the due date set in the Order.
- 6. The Public Staff respectfully requests that the Commission extend the due date for the filing of Public Staff and other intervenor testimony and exhibits in this docket to February 22, 2018, and for the filing of rebuttal testimony and exhibits to March 2, 2018.
- 7. The Public Staff is authorized to state that Frontier consents to this motion.

THEREFORE, the Public Staff requests that the Commission grant an extension of time to February 22, 2018, for the Public Staff and other intervenors to file testimony and exhibits, and an extension to March 2, 2018, for Frontier to file rebuttal testimony and exhibits.

Respectfully submitted, this the 15th day of February, 2018.

PUBLIC STAFF
Christopher J. Ayers
Executive Director

David T. Drooz Chief Counsel

<u>Electronically submitted</u> /s/ Elizabeth D. Culpepper Staff Attorney

4326 Mail Service Center Raleigh, North Carolina 27699-4300

Telephone: (919) 733-6110

elizabeth.culpepper@psncuc.nc.gov

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 15th day of February, 2018.

Electronically submitted /s/ Elizabeth D. Culpepper