

September 19, 2017

VIA ELECTRONIC FILING

Ms. M. Lynn Jarvis
Chief Clerk
North Carolina Utilities Commission
430 N. Salisbury Street, Dobbs Building
Raleigh, North Carolina 27603

Re: Docket No. G-40, Sub 142

Dear Ms. Jarvis:

Attached please find Frontier Natural Gas Company's Motion for Extension of Time in the above-captioned docket.

Thank you for your assistance with this matter. If you have any questions about this filing, you may reach me at the number shown above.

Sincerely,

s/ James H. Jeffries IV
James H. Jeffries IV

JHJ/rkg

Enclosure

cc: Len Green
Fred Steele

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

DOCKET NO. G-40, SUB 142

In the Matter of:)	
)	
Frontier Natural Gas Company -)	MOTION FOR EXTENSION
Violations of Title 49 Code of Federal)	OF TIME
Regulations, Part 192, Subpart O)	
)	

Frontier Natural Gas Company (“Frontier”) through counsel and pursuant to Rule R1-7 of the Rules of Practice and Procedure of the North Carolina Utilities Commission (“Commission”) hereby moves the Commission for a seven-day extension of time for Frontier to file its direct testimony in the above-referenced docket. In support of this motion, Frontier respectfully shows unto the Commission the following:

1. On July 14, 2017, the Commission issued its *Order Scheduling Show Cause Hearing* which established discovery procedures, set September 5, 2017 as the due date for the Commission Staff to file its pre-filed testimony, September 25, 2017 as the due date for testimony of Frontier and any intervenors, and scheduled an evidentiary hearing for October 16, 2017.

2. On August 25, 2017, the Commission Staff filed its direct testimony and exhibits.

3. Since the issuance of the Show Cause Order, Frontier has taken steps to address the matters addressed therein including running baseline assessments on its T-3 and T-7 transmission lines. Frontier has also solicited support for its ongoing integrity management and system safety efforts and following a brief selection process has retained AECOM, an independent engineering firm, to assist Frontier

with coming into complete compliance with PHMSA regulations and to overhaul Frontier's compliance plan. Frontier retained AECOM on approximately September 14, 2017 and has asked them to assist in the filing of testimony in the pending show cause proceeding. In addition, on September 14, 2017, Frontier also engaged new outside counsel to assist in the proceedings in this docket.

4. In order to allow Frontier time to fully address the compliance related matters addressed in the Show Cause Order and to allow its new consultants a reasonable period of time in which to provide assistance in this regard, Frontier respectfully requests a seven-day extension of time to file its pre-filed testimony in this docket.

5. Frontier submits that the one week extension of time requested herein is for good cause, is otherwise reasonable, and will not cause prejudice to any party in this matter.

6. Frontier has conferred with the Commission Staff and is authorized to represent that the Commission Staff, acting as a party to this proceeding, consents to the extension of time requested herein.

WHEREFORE, Frontier respectfully requests that the Commission grant an extension of the time in which to file its pre-filed testimony from September 25, 2017 to October 2, 2017.

This the 19th day of September, 2017.

Frontier Natural Gas Company

/s/ James H. Jeffries IV
James H. Jeffries IV

OF COUNSEL:

Moore & Van Allen PLLC
100 North Tryon Street, Suite 4700
Charlotte, NC 28202-4003
Telephone: 704-331-1079
Facsimile: 704-339-5879
Email: jimjeffries@mvalaw.com

OFFICIAL COPY

Sep 19 2017

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the attached is being served this date upon all of the parties to this docket electronically or by depositing a copy of the same in the United States Mail, First Class Postage Prepaid, at the addresses contained in the official service list in this proceeding.

This the 19th day of September, 2017.

/s/ Richard K. Goley
Richard K. Goley