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February 10, 2022

**VIA ELECTRONIC FILING**

Ms. Shonta Dunston  
Chief Clerk  
North Carolina Utilities Commission  
430 N. Salisbury Street, Dobbs Building  
Raleigh, North Carolina 27603

RE: G-39, Sub 47  
Cardinal Pipeline Company, LLC  
Request for Waivers

Dear Ms. Dunston:

Pursuant to the North Carolina Utilities Commission's ("Commission") July 27, 2017 order issued in Docket No. G-39, Sub 38, and as described in Cardinal Pipeline Company, LLC's ("Cardinal") February 10, 2022 notice filed in the referenced docket, Cardinal plans to file on March 15, 2022 a general rate case to adjust its rates and charges. The purpose of the instant filing is to request a waiver of certain Commission requirements pertaining to such general rate case filing.

Specifically, Cardinal requests a waiver of the requirement to file "Item 25 – Accounts Payable" and "Item 26 – Lead / Lag Study" required by Commission Form G-1, General Rate Case requirements (approved by the Commission in its "Order Adopting Form G-1, in Docket No. G-100, Sub 44). These items are not relevant to Cardinal's rate case filing inasmuch as Cardinal will not be claiming any cash working capital allowance.

Cardinal also requests a waiver of Rule R1-17(d) of the Rules and Regulations of the Commission, which requires that Cardinal file notice to its customers of its general rate case filing within 30 days of the filing in newspapers having "general circulation in its service area." Cardinal's

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Feb 11 2022

customers include only Piedmont Natural Gas Company, Inc., and Public Service Company of North Carolina, Inc., who are aware of the upcoming rate case, and Cardinal does not provide any service directly to the retail customers for whom this notice requirement is intended to protect.

The waivers requested herein will enable Cardinal to avoid unnecessary costs and expenses associated with preparing and filing its rate case. Cardinal has had discussions with the Public Staff regarding this matter, and the Public Staff does not object to the grant of the requested waivers. Accordingly, Cardinal submits that good cause exists for granting the relief requested herein.

Sincerely,



Robert W. Kaylor