

**STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH**

DOCKET NO. G-5, SUB 667

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of		
Joint Application of Public Service)	THE PUBLIC STAFF'S
Company of North Carolina, Inc. and)	MOTION FOR EXTENSION
Enbridge Parrot Holdings, LLC to Engage)	OF TIME TO FILE TESTIMONY
in a Business Combination Transaction)	

NOW COMES THE PUBLIC STAFF – North Carolina Utilities Commission (Public Staff), by and through its Executive Director, Christopher J. Ayers, and hereby respectfully moves the North Carolina Utilities Commission (Commission) to extend the time for the filing of the testimony of intervenors and the Public Staff and for rebuttal testimony. In support of this motion, the Public Staff shows as follows:

1. On October 20, 2023, Public Service Company of North Carolina, Inc., d/b/a Dominion Energy North Carolina (PSNC) and Enbridge Parrot Holdings, LLC (EP Holdings) (together, Joint Applicants), filed a joint application pursuant to N.C. Gen. Stat. § 62-111(a) and Commission Rule R1-5 for authorization to engage in a business combination transaction. Attached to the joint application were the Purchase and Sale Agreement entered into by Dominion Energy, Inc., and EP Holdings, a Cost-Benefit Analysis, and a Market Power Analysis.

2. On November 15, 2023, the Joint Applicants filed direct testimony and exhibits.

3. On January 10, 2024, the Commission issued its Order Scheduling Hearings, Establishing Discovery Guidelines, and Requiring Customer Notice, which, among other things, provides that the Public Staff and intervenors, if any, shall file their testimony on or before May 13, 2024, and the Joint Applicants shall file their rebuttal testimony, if any, on or before May 29, 2024.

4. Thereafter, the Public Staff filed its Motion for Extension of Time to File Testimony, which the Commission granted, extending the date for Public Staff and intervenors to file testimony to May 17, 2024, and for the Joint Applicants to file rebuttal testimony to May 31, 2024.

5. Thereafter, the Joint Applicants and the Public Staff jointly filed a Motion for Extension of Time to File Testimony, which the Commission granted, extending the date for Public Staff and intervenors to file testimony to May 24, 2024.

6. The Public Staff has been working diligently on this matter, including conducting discovery, preparing its testimony and proposed regulatory conditions, and engaging in protracted settlement negotiations, but will not be in a position to file testimony by May 24, 2024.

7. The Public Staff respectfully requests that the Commission extend the due date for the filing of the testimony of intervenors and the Public Staff to May 29, 2024. The Public Staff contacted counsel for the parties and is authorized to represent that no party objects to this Motion. The Joint Applicants and the

Public Staff will address the need for any extension of the rebuttal deadline in a subsequent filing.

Respectfully submitted this 24th day of May, 2024.

PUBLIC STAFF
Christopher J. Ayers
Executive Director

Lucy E. Edmondson
Chief Counsel

Electronically submitted
/s/ Elizabeth D. Culpepper
Staff Attorney
elizabeth.culpepper@psncuc.nc.gov

430 North Salisbury Street
4326 Mail Service Center
Raleigh, North Carolina 27699-4300
Telephone: (919) 733-6110

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing has been served on all parties of record or their attorneys, or both, in accordance with Commission Rule R1-39, by United States Mail, first class or better; by hand delivery; or by means of facsimile or electronic delivery upon agreement of the receiving party.

This the 24th day of May, 2024.

Electronically submitted
/s/ Elizabeth D. Culpepper