

**BEFORE THE NORTH CAROLINA UTILITIES COMMISSION**

**DOCKET NO. G-9, SUB 722**  
**DOCKET NO. G-9, SUB 781**  
**DOCKET NO. G-9, SUB 786**

In the Matter of

Docket No. G-9, Sub 722 )  
)  
Consolidated Natural Gas Construction and )  
Redelivery Services Agreement Between Piedmont )  
Natural Gas Company, Inc., and Duke Energy )  
Carolinas, LLC )  
)  
Docket No. G-9, Sub 781 )  
)  
Application of Piedmont Natural Gas Company, Inc. )  
for an Adjustment of Rates, Charges, and Tariffs )  
Applicable to Service in North Carolina )  
)  
Docket No. G-9, Sub 786 )  
)  
Application of Piedmont Natural Gas Company, Inc. )  
for Modifications to Existing Energy Efficiency )  
Programs and Approval of New Energy Efficiency )  
Programs )

**MOTION FOR EXTENSION  
OF TIME**

Piedmont Natural Gas Company, Inc. (“Piedmont” or the “Company”), 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 an eleven (11) day extension of time to file proposed orders and/or briefs as set out in the Commission’s Notice of Due Date for Proposed Orders and/or Briefs filed in this proceeding on September 14, 2021 (“Notice”). In support of this motion, Piedmont respectfully shows unto the Commission the following:

1. On September 7, 2021, on behalf of Piedmont, the Public Staff – North Carolina Utilities Commission (“Public Staff”), Carolina Utility Customers Association, Inc. (“CUCA”), and Carolina Industrial Group for Fair Utility Rates IV (“CIGFUR IV”) (collectively, the “Stipulating Parties”), Piedmont filed the Stipulation of Partial Settlement (“Settlement”) in the above-captioned dockets resolving many of the issues before the Commission.

2. The Stipulation sets forth various obligations for Piedmont to file updated information related to various matters in the above-captioned proceedings (“Update Filings”).

3. On September 14, 2021, the Commission issued its Notice which established that proposed orders and/or briefs are due to be filed no later than October 14, 2021.

4. The terms of the Stipulation require that the Update Filings be filed with the Commission on or before October 11, 2021, three (3) days before proposed orders and/or briefs are currently due to be filed, with an additional five (5) business days provided thereafter for the filing of supplemental testimony and exhibits on the Update Filings.

5. This sequence creates the possibility that evidence will be received into the record after the due date for proposed briefs and orders thereby effectively precluding any of the parties from citing to such evidence in their proposed orders and briefs.

6. Piedmont respectfully submits that administrative efficiency and the orderly prosecution of this case would be better served if briefs and proposed orders

were due within a reasonable time after the close of the record, which could occur as late as October 18, 2021.

7. In order to allow parties in these proceedings adequate time to incorporate information provided by the Update Filings and the Company and Public Staff's response thereto, and to ensure a complete record prior to the filing of proposed orders and briefs, Piedmont requests that the Commission grant an extension of eleven (11) days, until October 25, 2021, for the parties to file proposed orders and/or briefs in this proceeding.

8. Piedmont has conferred with the other parties to these proceedings regarding this request and has been informed that the parties do not object to the request for relief set forth herein.

WHEREFORE, Piedmont respectfully requests that the Commission grant an eleven (11) day extension of the time in which parties are allowed to file proposed orders and/or briefs in this proceeding.

Respectfully submitted, this the 29<sup>th</sup> day of September, 2021.

**Piedmont Natural Gas Company, Inc.**

/s/ James H. Jeffries IV  
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**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 29<sup>th</sup> day of September, 2021.

/s/ Sloane K. O'Hare

Sloane K. O'Hare