

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

DOCKET NO. G-9, SUB 791

In the Matter of )  
Application of Piedmont Natural Gas )  
Company, Inc., for Annual Review of )  
Gas Costs Pursuant to N.C. Gen. Stat. )  
§ 62-133.4(c) and Commission Rule )  
R1-17(k)(6) )

**MOTION OF PIEDMONT  
NATURAL GAS COMPANY, INC.  
TO EXCUSE THE APPEARANCE  
OF WITNESSES**

Piedmont Natural Gas Company, Inc. ("Piedmont" or the "Company"), through counsel, respectfully moves the Commission for an order (1) excusing the appearance of Piedmont witnesses Todd Breece, Jeff Patton, and MaryBeth Tomlinson at the remote expert witness hearing scheduled in this proceeding for October 11, 2021, and (2) allowing the introduction of all prefiled testimony and exhibits of these witnesses into the record at such hearing. In support of this request, Piedmont respectfully shows unto the Commission as follows:

1. This proceeding is Piedmont’s annual gas cost review proceeding in which the Commission receives testimony and rules on the prudence of Piedmont’s incurrence of gas costs for the 12 months ended May 31, 2021, and the propriety of its accounting for such costs during such period.

2. On August 2, 2021, Piedmont prefiled the testimony of Todd Breece, and the testimony and exhibits of Jeff Patton and MaryBeth Tomlinson in this proceeding in which these witnesses attested to the prudence of Piedmont’s gas costs during the review period and the propriety of its accounting for such costs. On August 9, 2021, Piedmont made an errata filing of MaryBeth Tomlinson's Exhibit\_(MBT-5) which was inadvertently omitted from the August 2<sup>nd</sup> filing.

3. Based upon a review of the filed testimony, there does not appear to be any matter in dispute between the parties who have filed testimony in this proceeding.

4. Counsel for Piedmont has conferred with counsel for the Public Staff and is authorized to represent that they agree (a) to waive cross-examination of Piedmont witnesses Breece, Patton, and Tomlinson; (b) to consent to the introduction of the prefiled testimony and exhibits of these witnesses into the record without the necessity for the appearance of such witnesses; and (c) to the excusal of Piedmont witnesses Breece, Patton, and Tomlinson from appearance at the hearing of this matter.

WHEREFORE, Piedmont respectfully requests that the Commission enter an order (1) excusing the appearance of Piedmont witnesses Breece, Patton, and Tomlinson at the remote expert witness hearing scheduled in this docket for October 11, 2021; and (2) accepting the prefiled testimony and exhibits of these witness into the record of this proceeding without requiring their appearance.

Respectfully submitted, this the 8<sup>th</sup> day of October, 2021.

**Piedmont Natural Gas Company, Inc.**

/s/ James H. Jeffries IV

James H. Jeffries IV

OF COUNSEL:

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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 8<sup>th</sup> day of October, 2021.

/s/ Keith Goley  
Keith Goley