

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 an additional two-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 raised 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 in

attaining full compliance with PHMSA regulations and in overhauling Frontier's compliance plan. Frontier retained AECOM on approximately September 14 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. On September 19, 2017, with the consent of Commission Staff, Frontier requested a seven-day extension of time to file its pre-filed testimony in this docket to and until October 2, 2017.

5. Frontier's request was granted by Commission Order on September 25, 2017, which established the new deadline for Frontier's pre-filed testimony as October 2, 2017.

6. Frontier is currently working diligently to prepare its pre-filed direct testimony in this docket but is in need of an additional short extension of two days to complete that testimony.

7. In order to address the broad range of issues raised in the Commission Staff's testimony, Frontier requests an additional two-day extension of time to file its pre-filed direct testimony in this docket to and until October 4, 2017.

8. 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 additional extension of the time in which it may file its pre-filed testimony from October 2, 2017 to October 4, 2017.

This the 28th day of September, 2017.

Frontier Natural Gas Company

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

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Sep 28 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 28th day of September, 2017.

/s/ Richard K. Goley
Richard K. Goley