

STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH

DOCKET NO. G-39, SUB 46
DOCKET NO. G-39, SUB 47

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

DOCKET NO. G-39, SUB 46)	
)	
In the Matter of)	
Cardinal Pipeline Company, LLC)	
Depreciation Rate Study as of)	
December 31, 2020)	MOTION OF THE PUBLIC
)	STAFF FOR EXTENSION OF
DOCKET NO. G-39, SUB 47)	TIME TO FILE TESTIMONY
)	
In the Matter of)	
Application of Cardinal Pipeline)	
Company, LLC for an Adjustment in)	
its Rates and Charges)	

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

1. On March 15, 2022, Cardinal Pipeline Company, LLC (Cardinal) filed in Docket No. G-39, Sub 47 an *Application of Cardinal Pipeline Company, LLC For an Adjustment in its Rates and Charges* (Sub 47 Rate Case). Cardinal’s Sub 47 Rate Case application includes a request for approval to implement the depreciation rate changes included in its Depreciation Rate Study.

2. On April 7, 2022, the Commission issued an *Order Establishing General Rate Case and Suspending Rates* in the above-referenced dockets.

3. On May 2, 2022, the Commission issued an *Order Scheduling Investigation, Establishing Intervention and Testimony Due Dates and Discovery Guidelines, and Requiring Notice* (Scheduling Order). The Scheduling Order, among other things, directed the Public Staff and intervenors to file direct testimony and exhibits on or before Friday, June 10, 2022, and required that the rebuttal testimony and exhibits, if any, of any and all parties be filed on or before, Friday, June 24, 2022.

4. The Public Staff has been working diligently; however, due to the unexpected illness of the Public Staff's intended accounting witness and the complexity involved in some of the revenue requirement calculations, the Public Staff will need an additional business day to finalize its testimony and schedules. Because a final revenue requirement is necessary for the Public Staff's engineering witness to calculate rates, the Public Staff will also need an additional business day to file the testimony of its engineering witness. The Public Staff intends to file the testimony of its rate of return and depreciation witnesses on June 10, 2022.

5. In light of the foregoing, the Public Staff respectfully requests that the Commission extend the due date for the filing of all direct testimony and exhibits of intervenors and the direct testimony and exhibits of the Public Staff's accounting

and engineering witnesses to June 13, 2022, and extend the time for the filing of rebuttal testimony and exhibits, if any, to June 27, 2022.

6. Counsel for the Public Staff consulted with Cardinal's counsel and the other parties and is authorized to represent that no party objects to the Public Staff's motion.

WHEREFORE, for the reasons set forth above, the Public Staff respectfully requests that the Commission issue an order extending the time for filing the direct testimony and exhibits of intervenors and the direct testimony and exhibits of the Public Staff's accounting and engineering witnesses to and including June 13, 2022, and extend the time for filing rebuttal testimony and exhibits, if any, to and including June 27, 2022.

Respectfully submitted, this the 10th day of June, 2022.

PUBLIC STAFF
Christopher J. Ayers
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Electronically submitted
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CERTIFICATE OF SERVICE

I do hereby certify that I have this day served a copy of the foregoing Motion upon each of the parties of record in this proceeding or their attorneys of record by emailing them an electronic copy or by causing a paper copy of the same to be hand-delivered or deposited in the United States Mail, postage prepaid, properly addressed to each.

This the 10th day of June, 2022.

Electronically submitted
/s/ Gina C. Holt