

**STATE OF NORTH CAROLINA  
UTILITIES COMMISSION  
RALEIGH**

DOCKET NO. E-22, SUB 644

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of	
Application by Virginia Electric and Power	)
Company, d/b/a/ Dominion Energy North	)
Carolina, for Authority to Adjust its Electric	)
Rates and Charges and Revise its Fuel	)
Factor under N.C. Gen. Stat. § 62-133.2 and	)
Commission Rule R8-55	)

**MOTION OF THE  
PUBLIC STAFF TO EXTEND  
CERTAIN DEADLINES**

NOW COMES the Public Staff of the 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 deadlines set forth in the Commission's September 16, 2022 Order Scheduling Hearing, Requiring Filing of Testimony, Establishing Discovery Guidelines, and Requesting Public Notice (Scheduling Order) for the reasons set forth herein. This motion is made in accordance with the applicable jurisprudence, including Commission Rule R1-7(a)(5).

1. In the above-captioned case Applicant Virginia Electric and Power Company, d/b/a Dominion Energy of North Carolina (DENC) seeks to adjust the fuel component of its electric rates. The initial filing was made on August 9, 2022. On the afternoon of October 17, 2022, DENC filed a petition to modify the Test Period in the initial filing in order to update its deferral balances for the months of July, August, and September 2022. After close of business on October 17, 2022, DENC provided the Public Staff with the supplemental testimonies of Ronnie T.

Campbell, Dale E. Hinson, Jeffrey D. Matzen, and Timothy P. Stuller in a filing consisting of 70 pages.

2. The deferral balance at issue is “significant” per DENC’s Application filed August 9, 2022, page 4, paragraph 10. In that Application DENC set forth intricate mitigation proposals to address this significant deferral balance.

3. The Scheduling Order provides that intervenor and Public Staff testimony and exhibits are to be filed by October 19, 2022. The updated filing and accompanying information is voluminous and includes complex mitigation proposals that will require careful review and study. If the deadline for filing testimony is not moved, there would only be one to two business days for analysis of a complex filing and the preparation of testimony and exhibits by intervenors and the Public Staff.

4. Commission Rule R1-7(a)(5) specifically provides for the making of motions “for an extension of time within which to comply with an order of the Commission”.

5. The Public Staff has consulted with counsel for DENC and counsel for all the intervenors in the case, which are: (1) the Carolina Industrial Group for Fair Utility Rates I (CIGFUR I); and (2) Nucor Steel-Hertford, a division of Nucor Corporation (NUCOR). DENC and CIGFUR I agreed to the dates set forth in paragraph 6 below. As of the filing of this motion, no response has been received from NUCOR.

6. The Public Staff hereby requests the deadline for filing intervenor and Public Staff testimony and exhibits be moved from Wednesday, October 19, 2022, to Monday, October 24, 2022. Further, the Public Staff requests that the date by which DENC may file rebuttal testimony and exhibits be moved from Friday, October 28, 2022, to Tuesday, November 1, 2022.

7. The requested extensions should not impact the hearing set for Wednesday, November 9, 2022.

WHEREFORE, the Public Staff respectfully moves and requests the Commission grant an extension of the deadlines in the manner set forth herein and for such other and further relief as may be just and proper.

Respectfully submitted this 18th day of October 2022.

PUBLIC STAFF

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## CERTIFICATE OF SERVICE

I certify that I have caused to be served a copy of the foregoing on all the parties of record on the date set forth below in the manner set forth below on the person(s) set forth below and in accordance with the applicable jurisprudence, especially Commission Rule R1-39.

Served on October 18, 2022, via email electronic delivery by agreement of the receiving party, upon those persons identified in the filed documents or in the Commission's online docket's service list at the following addresses:

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