

November 17, 2023

**VIA Electronic Filing**

Ms. A. Shonta Dunston, Chief Clerk  
North Carolina Utilities Commission  
Dobbs Building  
430 North Salisbury Street  
Raleigh, North Carolina 27603

*Re: Application of Virginia Electric and Power Company, d/b/a Dominion Energy North Carolina, for Authority to Adjust its Electric Rates and Charges Pursuant to N.C.G.S. 62-133.9 and Commission Rule R8-69 Docket No. E-22, Sub 676*

Dear Ms. Dunston:

Enclosed for filing in the above-referenced docket on behalf of Virginia Electric and Power Company, d/b/a Dominion Energy North Carolina and the Public Staff of the North Carolina Utilities Commission is their *Joint Motion to Excuse Witnesses and Cancel Evidentiary Hearing*.

If you have any questions, please do not hesitate to contact me. Thank you for your attention to this matter.

Very truly yours,

*/s/Andrea R. Kells*

Cc: Lucy Edmondson, Public Staff – NC Utilities Commission  
Anne Keyworth, Public Staff – NC Utilities Commission  
Nadia Luhr, Public Staff – NC Utilities Commission

STATE OF NORTH CAROLINA  
UTILITIES COMMISSION  
RALEIGH

DOCKET NO. E-22, SUB 676

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of  
Application of Virginia Electric and Power Company, d/b/a Dominion Energy North Carolina, for Authority to Adjust its Electric Rates and Charges Pursuant to N.C.G.S. § 62-133.9 and Commission Rule R8-69 ) JOINT MOTION TO EXCUSE ) WITNESSES AND CANCEL ) EVIDENTIARY HEARING )

NOW COME Virginia Electric and Power Company, d/b/a Dominion Energy North Carolina (“DENC”) and the Public Staff – North Carolina Utilities Commission (“Public Staff”) and, together, respectfully request that the North Carolina Utilities Commission (“Commission”) issue an order in the above-captioned docket excusing DENC’s and the Public Staff’s witnesses from appearing at the evidentiary hearing scheduled in this proceeding for November 28, 2023, and to cancel the evidentiary hearing.

In support of this Motion, DENC and the Public Staff show as follows:

1. On August 15, 2023, DENC filed its Application for Approval of DSM and EE Cost Recovery Rider (“Application”) along with the pre-filed testimony of Michael T. Hubbard, Edmund J. Hall, Jarvis E. Bates, Justin A. Wooldridge, Christopher C. Hewett and Casey R. Lawson in support of the Application.
2. On August 23, 2023, Carolina Utility Customers Association, Inc. (“CUCA”) filed a Petition to Intervene. The Commission granted the Petition on August 28, 2023.
3. On August 25, 2023, Carolina Industrial Group for Fair Utility Rates I

(“CIGFUR I”) filed a Petition to Intervene. The Commission granted the Petition on August 28, 2023.

4. On September 7, 2023, the Commission issued its *Amended Order Scheduling Hearing, Requiring Filing of Testimony, Establishing Discovery Guidelines and Requiring Public Notice* (“Scheduling Order”).

5. The Company filed its Affidavit of Publication as directed by the Scheduling Order on October 11, 2023.

6. On November 7, 2023, the Public Staff filed the Direct Testimony of Tommy C. Williamson, Jr. and the Notice of Affidavit and Affidavit of Hemanth Meda.

7. No other party filed testimony in the proceeding.

8. On November 16, 2023, DENC filed a Letter in Lieu of Rebuttal Testimony.

9. A review of the pre-filed testimony of DENC and the Public Staff indicates that no conflicting positions exist between the Public Staff and DENC, and these parties agree on the Company’s Rider C and Rider CE rates, as set forth in their respective testimony and affidavit.

10. DENC and the Public Staff have reached agreement on all issues, and each agrees to waive cross-examination of the other party’s witnesses. As such, DENC and the Public Staff request that their respective witnesses be excused from appearing at the hearing scheduled for November 28, 2023 pursuant to the Scheduling Order, unless the Commission has questions for them, and that the evidentiary hearing be canceled.

11. Counsel for CIGFUR I and C U C A have also agreed to waive cross-examination of DENC and the Public Staff’s witnesses and has indicated that it

does not object to this motion to excuse.

Therefore, DENC and the Public Staff respectfully move:

1. That the Commission excuse the witnesses for DENC and the Public Staff from appearing at the hearing on November 28, 2023, unless the Commission has questions for any of these witnesses, and cancel the evidentiary hearing;
2. That the pre-filed testimony, exhibits, and affidavits of the respective witnesses be received into evidence and made part of the record in this matter; and
3. That the Commission grant further relief as the Commission deems just and proper.

Respectfully submitted, this the 17th day of November, 2023.

/s/ Andrea R. Kells

Andrea R. Kells  
McGuireWoods LLP  
501 Fayetteville Street, Suite 500  
PO Box 27507 (27611)  
Raleigh, North Carolina 27601  
Telephone: (919) 755-6614  
[akells@mcguirewoods.com](mailto:akells@mcguirewoods.com)

*Counsel for Virginia Electric and Power  
Company, d/b/a Dominion Energy North  
Carolina*

/s/ Anne M. Keyworth

Anne M. Keyworth  
The Public Staff – North Carolina Utilities  
Commission  
4326 Mail Service Center  
Raleigh, North Carolina 27699-4300  
Telephone: (919) 733-6110  
[anne.keyworth@psncuc.nc.gov](mailto:anne.keyworth@psncuc.nc.gov)

*Counsel for The Public Staff – North  
Carolina Utilities Commission*

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing *Joint Motion to Excuse Witnesses and Cancel Evidentiary Hearing*, as filed in Docket No. E-22, Sub 676, was served electronically or via U.S. mail, first-class, postage prepaid, upon all parties of record.

This, the 17<sup>th</sup> day of November, 2023.

/s/ Andrea R. Kells  
Andrea R. Kells  
McGuireWoods LLP  
501 Fayetteville Street, Suite 500  
Raleigh, North Carolina 27601  
Telephone: (919) 755.6614  
akells@mcguirewoods.com

*Attorney for Virginia Electric and Power  
Company, d/b/a Dominion Energy North  
Carolina*