

**STATE OF NORTH CAROLINA  
UTILITIES COMMISSION  
RALEIGH**

DOCKET NO. G-5, SUB 632  
DOCKET NO. G-5, SUB 634

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

DOCKET NO. G-5, SUB 632

In the Matter of	)	MOTION OF THE
Application of Public Service Company of	)	PUBLIC STAFF FOR
North Carolina, Inc., for a General	)	EXTENSION OF TIME
Increase in Rates and Charges	)	
	)	
DOCKET NO. G-5, SUB 634	)	
	)	
In the Matter of	)	
Application for Approval to Modify Existing	)	
Conservation Programs and Implement	)	
New Conservation Programs	)	

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 of intervenors and the Public Staff- North Carolina Utilities Commission (Public Staff) and for rebuttal testimony. In support of this motion, the Public Staff respectfully shows the Commission the following:

1. On April 1, 2021, Public Service Company of North Carolina, Inc. d/b/a Dominion Energy North Carolina (PSNC or the Company) filed an Application for Rate Increase in Docket No. G-5, Sub 632 (Sub 632 Rate Case).

2. On April 27, 2021 the Commission declared the proceeding to be a general rate case and suspended rates for up to 270 days.

3. On May 4, 2021, the Public Staff filed a Motion to Consolidate Dockets requesting the Commission to issue an order consolidating the Sub 632 Rate Case with Docket No. G-5, Sub 634.

4. By Order dated May 18, 2021, the Commission granted the Public Staff's motion and consolidated the Sub 632 Rate Case and the Sub 634 docket.

5. On June 11, 2021, the Commission issued an *Order Scheduling Investigation and Hearings, Establishing Intervention and Testimony Due Dates and Discovery Guidelines, and Requiring Public Notice* (Procedural Order) which, among other things, directed the Public Staff and intervenors to file direct testimony on or before September 17, 2021, and the Company to file its rebuttal testimony and exhibits, if any, by October 1, 2021.

4. The Public Staff has been working diligently on this matter, including conducting discovery and preparing its testimony, but needs additional time to review and address in its testimony recently-received and forthcoming data request responses from the Company. Therefore, the Public Staff will not be in a position to file testimony by September 17, 2021.

5. The Public Staff respectfully requests that the Commission extend the due date for the filing of the direct testimony and exhibits of intervenors and the Public Staff in this docket to September 23, 2021, and for the filing of the rebuttal testimony and exhibits of the Company, if any, to October 7, 2021.

6. The Public Staff has contacted counsel for the parties. No party indicated that they objected to the proposed extensions.

WHEREFORE, for the reasons set forth above, the Public Staff respectfully requests that the Commission extend the time for filing intervenor and Public Staff testimony and exhibits to September 23, 2021, and for the filing of Company rebuttal testimony and exhibits, if any, to October 7, 2021.

Respectfully submitted this 15th day of September, 2021.

PUBLIC STAFF  
Christopher J. Ayers  
Executive Director

Dianna W. Downey  
Chief Counsel

Electronically submitted  
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### CERTIFICATE OF SERVICE

I do hereby certify that I have 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 15th day of September 2021.

Electronically submitted  
/s/ Gina C. Holt