## 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	)
DOCKET NO. G-39, SUB 47	) MOTION TO CONSOLIDATE ) DOCKETS
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 moves for the issuance of an order consolidating the above dockets. In support of this motion, the Public Staff respectfully shows the Commission:

- 1. On October 26, 2021, in Docket No. G-39, Sub 46 (Sub 46 Docket), Cardinal Pipeline Company, LLC (Cardinal) filed a Depreciation Rate Study pursuant to Commission Rule R6-80, which requires each natural gas utility to submit a depreciation study for Commission approval every five years.
- Cardinal stated that its existing depreciation rates were contained in Cardinal's 2016 Depreciation Study and were implemented in Docket No. G-39, Sub 38, Cardinal's last general rate case effective May 1, 2017.

- 3. Cardinal's Depreciation Rate Study recommends changes in the Company's existing depreciation rates, and Cardinal requests in the Sub 46 Docket that the Commission allow Cardinal to implement the proposed changes in its depreciation rates in conjunction with Cardinal's next rate case.
- 4. On March 15, 2022, 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.
- 5. Although the Public Staff recognizes that Cardinal's Sub 46 Depreciation Rate Study may be considered separately from a general rate case, under these circumstances, the Public Staff believes that judicial economy will be served by consolidating the Sub 46 Docket with the Sub 47 Rate Case.
- 6. Counsel for the Public Staff consulted with Cardinal's counsel and is authorized to represent that Cardinal has no objection to the Public Staff's motion.

WHEREFORE, the Public Staff prays that the Commission issue an order consolidating Cardinal's Sub 46 Docket with its Sub 47 Rate Case docket, and that the Commission grant such other and further relief as the Commission may deem just and proper.

Respectfully submitted, this the 28th day of March, 2022.

PUBLIC STAFF Christopher J. Ayers Executive Director

Dianna W. Downey Chief Counsel

Electronically submitted
/s/ Gina C. Holt
Staff Attorney
gina.holt@psncuc.nc.gov

/s/ Reita Coxton Staff Attorney reita.coxton@psncuc.nc.gov

4326 Mail Service Center Raleigh, North Carolina 27699-4300 Telephone: (919) 733-6110

## **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 28th day of March, 2022.

Electronically submitted /s/ Gina C. Holt