

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

DOCKET NO. G-9, SUB 811

In the Matter of
Application of Piedmont Natural Gas)
Company, Inc., for Annual Review of)
Gas Costs Pursuant to N.C. Gen. Stat.)
§ 62-133.4(c) and Commission Rule)
R1-17(k)(6))

**MOTION FOR SUBSTITUTION OF
WITNESS AND ADOPTION OF
TESTIMONY**

Piedmont Natural Gas Company, Inc. ("Piedmont" or the "Company"), through counsel, and pursuant to Rule R1-7 of the Rules of Practice and Procedure of the North Carolina Utilities Commission ("Commission") respectfully moves to substitute Bryan Manges as the sponsor of the testimony and exhibits prefiled in the above-captioned proceedings by MaryBeth Tomlinson. In support of this request, Piedmont respectfully shows unto the Commission as follows:

1. This proceeding is Piedmont’s annual gas cost review proceeding in which the Commission receives testimony and rules on the prudence of Piedmont’s incurrence of gas costs for the 12 months ended May 31, 2022, and the propriety of its accounting for such costs during such period.

2. On August 1, 2022, Piedmont filed the testimony of Todd Breece, and the testimony and exhibits of Jeffrey Patton and MaryBeth Tomlinson in this proceeding in which these witnesses attested to the prudence of Piedmont’s gas costs during the review period and the propriety of its accounting for such costs.

3. On August 4, 2022, the Commission issued its Order Scheduling Hearing, Requiring Filing of Testimony, Establishing Discovery Guidelines and Requiring Public Notice.

4. On September 19, 2022, Public Staff filed the testimony of Sonja R. Johnson, the testimony and exhibits of Dustin R. Metz, and the testimony and exhibit of Jordan A. Nader.

5. On September 22, 2022, Piedmont filed its Affidavits of Publication, as required in the Commission's August 4th Order.

6. Ms. Tomlinson is currently out of state caring for a family member due to a medical issue, and will be unavailable to testify as a witness at the hearing of this matter.

7. In light of Ms. Tomlinson's unavailability, the Company is proposing that Bryan Manges, who is Ms. Tomlinson's direct supervisor, appear and adopt Ms. Tomlinson's pre-filed testimony and exhibits. Ms. Tomlinson's testimony and exhibits in this proceeding were prepared under Mr. Manges' supervision, Mr. Manges is familiar with and agrees with the analysis and conclusions set forth therein, and Mr. Manges has agreed to adopt Ms. Tomlinson's testimony, as filed, for purposes of the hearing in this matter.

WHEREFORE, for the reasons set forth above, Piedmont respectfully requests that Bryan Manges be substituted as the sponsor of the Testimony and Exhibits prefiled on behalf of MaryBeth Tomlinson in this proceeding and be permitted to testify in place of Ms. Tomlinson at the hearing of this matter.

Respectfully submitted, this the 26th day of September, 2022.

Piedmont Natural Gas Company, Inc.

/s/ James H. Jeffries IV

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the attached is being served this date upon all of the parties to this docket electronically or by depositing a copy of the same in the United States Mail, First Class Postage Prepaid, at the addresses contained in the official service list in this proceeding.

This the 26th day of September, 2022.

/s/ Rebecca D. Olsen
Rebecca D. Olsen