STATE OF NORTH CAROLINA UTILITIES COMMISSION RALEIGH

DOCKET NO. G-40, SUB 175

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

| In the Matter of | |
|-------------------------------------|---------------------------|
| Application of Frontier Natural Gas |) JOINT MOTION TO EXCUSE |
| Company for Annual Review of Gas |) APPEARANCE OF WITNESSES |
| Costs Pursuant to N.C.G.S. § 62- |) AND ACCEPT TESTIMONY |
| 133.4(c) and Commission Rule R1- |) |
| 17(k)(6) |) |

Frontier Natural Gas Company (Frontier) and the Public Staff – North Carolina Utilities Commission (Public Staff), through counsel, hereby jointly move the Commission for an order (1) excusing the appearance of witnesses at the expert witness portion of the hearing scheduled in this proceeding for March 5, 2024, and (2) allowing the introduction of all prefiled testimony and exhibits into the record at such hearing without the appearance of witnesses. In support of this request, Frontier and the Public Staff respectfully show unto the Commission as follows:

- 1. This proceeding is Frontier's annual gas cost review proceeding in which the Commission receives testimony and rules on the prudence of Frontier's incurrence of gas costs for the 12 months ended September 30, 2023, and the propriety of its accounting for such costs during such period.
- 2. On December 1, 2023, Frontier prefiled the testimony and exhibits of Taylor B. Younger and Jason Lemmon. These witnesses attested to the

prudence of Frontier's gas costs during the review period and the propriety of its accounting for such costs.

- 3. On December 21, 2023, Frontier filed the supplemental direct testimony and exhibit of Company witness Lemmon.
- On February 7, 2024, Frontier filed corrected Schedule Nos. 3 and
 to Company witness Lemmon's Exhibit_(JL-1).
- 5. On February 19, 2024, the Public Staff filed the testimony of Andrew R. S. Puglisi and Sonja R. Johnson.
 - 6. There are no other parties to this proceeding.
- 7. Based upon a review of the testimony, it does not appear that there are any matters in dispute between Frontier and the Public Staff in this proceeding.
- 8. Counsel for Frontier and the Public Staff have conferred with respect to the lack of issues in this proceeding and have agreed (a) to waive cross-examination of each other's witnesses, (b) to consent to the introduction of the other's party's testimony and exhibits into the record without the necessity for the appearance of such witnesses, and (c) to jointly seek the excusal of witnesses from appearance at the hearing of this matter.

WHEREFORE, Frontier and the Public Staff respectfully request that the Commission enter an order (1) excusing the appearance of all witnesses at the hearing scheduled in this docket for March 5, 2024, and (2) accepting the prefiled testimony and exhibits of all witnesses into the record of this proceeding without requiring the appearance of any such witnesses.

Respectfully submitted, this the 21st day of February, 2024.

Frontier Natural Gas Company

Electronically submitted
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Public Staff – North Carolina Utilities Commission

Electronically submitted
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CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Motion has been served on all parties of record or their attorneys, or both, in accordance with Commission Rule R1-39, by United States mail, first class or better; by hand delivery; or by means of facsimile or electronic delivery upon agreement of the receiving party.

This the 21st day of February, 2024.

<u>Electronically submitted</u> /s/ Elizabeth D. Culpepper