BEFORE THE NORTH CAROLINA UTILITIES COMMISSION DOCKET NO. G-9, SUB 743

In the Matter of

Application of Piedmont Natural Gas Company,) Inc. for an Adjustment of Rates, Charges, and) Tariffs Applicable to Service in North Carolina,) DAY LIMITED EXTENSION Continuation of its IMR Mechanism, Adoption of an EDIT Rider, and Other Relief

MOTION FOR ONE OF TIME

Piedmont Natural Gas Company, Inc. ("Piedmont") through counsel and pursuant to Rule R1-7 of the Rules of Practice and Procedure of the North Carolina Utilities Commission ("Commission") hereby moves the Commission for a one (1) business day extension of the time for Piedmont to file its rebuttal testimony relating to CUCA, CIGFUR IV, and Public Staff¹ witnesses in this proceeding. In support of this motion, Piedmont respectfully shows unto the Commission the following:

- On July 30, 2019, Piedmont sought and was granted a oneweek extension of time to file its rebuttal testimony in this proceeding to and until August 9, 2019. That request was premised upon ongoing efforts to explore the possibility of a settlement in this proceeding.
- 2. Piedmont is pleased to report that it has reached a settlement in principle with the Public Staff in this docket and is in active settlement discussions with CIGFUR IV and CUCA and is hopeful it will be able include these two parties in the settlement currently being worked on. If CIGFUR IV

¹ Piedmont does not envision any circumstances under which a settlement with the Public Staff will not be filed on Monday, August 12, 2019, however, out of an abundance of caution and recognizing that it is at least conceivable that some currently unforeseen issue could arise in the process of finalizing the Stipulation, Piedmont also seeks to reserve its right to rebut Public Staff witness testimony if a Stipulation is not finalized and filed on Monday.

and CUCA join in the settlement, then rebuttal to their respective witness' testimony will not be necessary.

- 3. Piedmont prefers to focus its efforts today on the completion of the settlement agreement with the Public Staff and on continuing efforts to resolve issues with CIGFUR IV and CUCA rather than on finalizing rebuttal testimony in response to the Public Staff, CIGFUR IV and CUCA's witnesses, all of which will ultimately prove to be unnecessary if the ongoing settlement efforts are fruitful.
- 4. Piedmont will file rebuttal today as to the testimony of Attorney General witness Woolridge and also in response to some of the public witness testimony in this proceeding but prefers to hold off on rebuttal with respect to the Public Staff's, CIGFUR IV's, and CUCA's witnesses.
- 5. Piedmont believes that it can conclude its settlement discussions with CUCA and CIGFUR IV and complete preparation of comprehensive settlement documents and any necessary settlement testimony by the close of business Monday, August 12, 2019.
- 6. Based on the foregoing, Piedmont respectfully requests a one (1) business day extension of the date by which it is required to file rebuttal testimony regarding the Public Staff, CUCA, and CIGFUR IV witnesses to and including August 12, 2019 in order to facilitate completion of the ongoing settlement discussions and the preparation and filing of appropriate settlement documents with the Commission.

7. Piedmont is authorized to state that the Public Staff, CUCA, CIGFUR IV, the Attorney General, NUCOR, and the Fayetteville Public Works Commission consent to this motion.

WHEREFORE, Piedmont respectfully requests that the Commission grant an extension of the time in which it may file rebuttal testimony as to the testimony of the Public Staff, CIGFUR IV, and CUCA witnesses from August 9, 2019 to August 12, 2019.

This the 9th day of August, 2019.

Piedmont Natural Gas Company, Inc.

<u>s/ James H. Jeffries IV</u> 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 9th day of August, 2019.

<u>/s/ Sloane K. O'Hare</u> Sloane K. O'Hare