

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,)
Continuation of its IMR Mechanism, Adoption)
of an EDIT Rider, and Other Relief)

**MOTION FOR
EXTENSION 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 seven (7) day extension of the time for Piedmont to file its rebuttal testimony in this proceeding. In support of this motion, Piedmont respectfully shows unto the Commission the following:

1. On February 27, 2019, Piedmont gave notice of its intent to file a general rate case.
2. On April 1, 2019, Piedmont filed a petition in this proceeding seeking: (1) continuation of Piedmont's Integrity Management Rider ("IMR") contained in Appendix E to its approved service regulations; (2) regulatory asset treatment for certain incremental Distribution Integrity Management Program ("DIMP") Operations and Maintenance ("O&M") expenses; (3) adoption of revised and updated depreciation rates for the Company's North Carolina and joint property assets; (4) updates and revisions to Piedmont's rate schedules and service regulations; (5) revised and updated amortizations and recovery of certain regulatory assets accrued since Piedmont's last general rate case proceeding; (6) approval of expanded energy efficiency and

conservation program spending; and (7) adoption of an Excess Deferred Income Tax (“EDIT”) Rider mechanism to manage the flowback to customers of deferrals and excess deferred income taxes created by changes to state and federal income tax rates (“Petition”).

3. On April 22, 2019, the Commission issued its Order Establishing General Rate Case and Suspending Rates.

4. On May 16, 2019, the Commission issued its *Order Scheduling Investigation and Hearings, Establishing Interventions and Testimony Due Dates and Discovery Guidelines and Requiring Public Notice* (“Scheduling Order”). The Scheduling Order sets August 2, 2019 as the deadline for the Company to file rebuttal testimony and exhibits.

5. Subsequent to the filing of the Company’s Petition in this docket, the Commission has allowed interventions by various parties and all parties have engaged in substantial discovery regarding the matters addressed by the Company’s Petition.

6. Following the filing of Intervenor testimony on July 19, 2019, Piedmont has been engaged in preparing its rebuttal testimony but has also committed substantial resources to trying to make progress in reaching a comprehensive or partial settlement of the issues in this docket. These efforts are ongoing.

7. Since the time that Intervenor testimony was filed, the Public Staff has also made numerous adjustments and corrections to the accounting recommendations set forth in its prefiled testimony. These changes are reflected in the record in a revised filing made by the Public Staff on Friday,

July 26, 2019. These changes and corrections have necessitated significant additional discussions with the Public Staff, production of supplemental workpapers by the Public Staff, and analysis of the Public Staff's revisions to its prefiled case by Piedmont.

8. Finally, on July 29, 2019, Piedmont made its update filing as allowed by N.C. Gen. Stat. § 62-133(c) and Commission Rule R1-17(c), in which it adjusted its proposed revenue requirement for actual costs incurred by the Company through June 30, 2019. This filing has prompted further additional discussions between the Public Staff and the Company and the requirement to produce and analyze workpapers supporting these updates.

9. In the approximate ten-day period since intervenor testimony was filed in this docket, Piedmont has been hard-pressed to simultaneously absorb and understand the proposed changes to its filed case (and the dynamic nature of those proposed changes), adjust its filed case for June 30 updates, pursue settlement, and prepare rebuttal testimony.

10. In order to allow the parties to continue the pursuit of a possible settlement of this docket, and for all of the other reasons set forth above, Piedmont is in need of additional time to file rebuttal testimony in this proceeding. Accordingly, Piedmont respectfully requests a seven (7) day extension of time in which it may file rebuttal testimony.

11. Piedmont is authorized to state that the Public Staff consents, and CIGFUR IV, the Attorney General, Fayetteville Public Works Commission and Nucor do not object, to the requested extension of time to file rebuttal

testimony set forth herein. Piedmont has sought feedback from CUCA but has not heard back from them on this motion.

12. Piedmont submits that the extension of time requested herein is reasonable and will not cause prejudice to any party in this matter.

WHEREFORE, Piedmont respectfully requests that the Commission grant an extension of the time in which it may file rebuttal testimony from August 2, 2019 to August 9, 2019.

This the 31st day of July, 2019.

Piedmont Natural Gas Company, Inc.

s/ James H. Jeffries IV
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 31st day of July, 2019.

/s/ Sloane K. O'Hare
Sloane K. O'Hare