

**STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH**

DOCKET NO. G-5, SUB 608

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of		
Application of Public Service)	MOTION TO
Company of North Carolina, Inc. for)	EXCUSE APPEARANCE OF
Annual Review of Gas Costs)	PUBLIC STAFF WITNESSES
Pursuant to N.C.G.S. § 62-133.4(c))	AND ACCEPT TESTIMONY
and Commission Rule R1-17(k)(6))	

NOW COMES THE PUBLIC STAFF - North Carolina Utilities Commission (Public Staff), by and through its Executive Director, Christopher J. Ayers, and respectfully moves the Commission for an order (1) excusing the appearance of witnesses at the hearing scheduled in this proceeding for August 13, 2019, and (2) allowing the introduction of all prefiled joint testimony and appendices into the record at such hearing without the appearance of witnesses. In support of this request, the Public Staff respectfully shows unto the Commission as follows:

1. This proceeding is Public Service Company of North Carolina, Inc.'s (PSNC or Company) annual gas cost review proceeding in which the Commission receives testimony and rules on the prudence of PSNC's incurrence of gas costs for the 12 months ended March 31, 2019, and the propriety of its accounting for such costs during such period.

2. On May 31, 2019, PSNC prefiled the testimony and exhibits of Rose M. Jackson and Candace A. Paton in this proceeding in which these witnesses attested to the prudence of PSNC's gas costs during the review period and the propriety of its accounting for such costs.

3. On July 22, 2019, Carolina Utility Customers Association, Inc. (CUCA) filed a Petition to Intervene, which was granted by the Commission on July 24, 2019.

4. On July 29, 2019, PSNC filed the Supplemental Testimony and Exhibit of Candace Paton, to clarify the interest rate applicable to the Company's Sales Customers Only, All Customers, and Hedging Deferred Gas Cost Accounts.

5. On July 29, 2019, the Public Staff filed the Joint testimony of Sonja R. Johnson, Geoffrey M. Gilbert, and Julie G. Perry.

6. In the Joint Testimony of the Public Staff, Public Staff witness Johnson stated she had reviewed the changes PSNC made to its deferred account during the review period as well as the interest rate. Witness Johnson explained that PSNC had reflected the current federal corporate income tax rate and the state corporate tax rate, and all other methods and procedures used by the Company for the accrual of interest on the Deferred Gas Cost Accounts remained unchanged.

7. On July 30, 2019, the Commission issued an *Order Denying in Part and Granting in Part Tariff Amendments, Requiring Reversal of Interest Charges, Requiring Annual Review of Interest Rate, and Requiring the Filing of Testimony*, which required the Company to file additional supplemental testimony in this docket.

8. On August 6, 2019, Company witness Paton filed Additional Supplemental Testimony and a Supplemental Exhibit 2.

9. The Public Staff has reviewed the Additional Supplemental Testimony filed Company witness Paton and agrees with the interest calculations set forth in Supplemental Exhibit 2.

10. Based upon a review of the Public Staff's joint testimony, it does not appear that there are any matters in dispute between PSNC and the Public Staff in this proceeding, and the Public Staff has no cross-examination questions for the Company's witnesses.

11. On August 7, 2019, the Commission issued an *Order Providing Notice of Commission Questions*, which posed specific questions that it intended to ask of Company witnesses Jackson and Paton.

12. Counsel for the Public Staff has conferred with counsel for PSNC and CUCA and they have agreed (a) to waive cross-examination of the Public Staff's witnesses, (b) to consent to the introduction of the Public Staff's joint testimony and appendices into the record without the necessity for the appearance of such witnesses and (c) to the excusal of the Public Staff's witnesses from appearance at the hearing of this matter.

WHEREFORE, the Public Staff respectfully requests that the Commission enter an order (1) excusing the appearance of all Public Staff witnesses at the hearing scheduled in this docket for August 13, 2019, and (2) accepting the prefiled joint testimony and appendices of all Public Staff witnesses into the record of this proceeding without requiring the appearance of any such witnesses.

Respectfully submitted, this the 8th day of August, 2019.

PUBLIC STAFF
Christopher J. Ayers
Executive Director

David T. Drooz
Chief Counsel

Electronically submitted
/s/ Gina C. Holt
Staff Attorney

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CERTIFICATE OF SERVICE

I certify that I have this day served a copy of the foregoing on each of the parties of record in this proceeding or the attorney of record of such party 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 8th day of August, 2019.

Electronically submitted
/s/ Gina C. Holt