

**STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH**

DOCKET NO. E-22, Sub 604

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of	
Application by Virginia Electric and Power Company d/b/a Dominion Energy North Carolina for Approval of Demand-Side Management and Energy Efficiency Cost Recovery Rider Pursuant to N.C. Gen. Stat. §62-133.9 and Commission Rule R8-69) JOINT MOTION TO CONDUCT EVIDENTIARY HEARING BY REMOTE MEANS AND TO EXCUSE WITNESSES

NOW COME THE PUBLIC STAFF – North Carolina Utilities Commission, by and through its Executive Director, Christopher J. Ayers, and Virginia Electric and Power Company, d/b/a Dominion Energy North Carolina (DENC), and, together, respectfully request that the Commission issue an order in the above-captioned docket excusing the Public Staff’s and DENC’s witnesses from appearing at the evidentiary hearing scheduled in this proceeding. In addition, the Public Staff and DENC jointly move the Commission to reschedule the evidentiary hearing to be held in this matter in Raleigh on Tuesday, November 22, 2021, in Commission Hearing Room 2115, to be conducted on the same date but by remote means.

In support of this motion, the Public Staff and DENC show as follows:

1. On August 10, 2021, DENC filed its Application for Approval of Demand-Side Management and Energy Efficiency Cost Recovery Rider Programs (Application) along with the pre-filed testimony of Michael T. Hubbard, Edmund J.

Hall, Jarvis E. Bates, Justin A. Wooldridge, Christopher C. Hewett, and Casey R. Lawson in support of the Application.

2. On August 23, 2021, the Commission issued an Order Scheduling Hearing, Requiring Filing of Testimony, Establishing Discovery Guidelines, and Requiring Public Notice (Scheduling Order).

3. On August 25, 2021, Carolina Industrial Group for Fair Utility Rates I (CIGFUR I) filed a Petition to Intervene. The Commission granted the petition on August 27, 2021.

4. On September 1, 2021, Carolina Utility Customers Association, Inc. (CUCA) filed a petition to intervene. The Commission granted the petition on September 3, 2021.

5. On October 14, 2021, the Commission issued an Order Rescheduling Expert Witness Hearings. The order rescheduled the expert witness hearing in this docket for Monday, November 22, 2021, beginning at 1:30 p.m. in Commission Hearing Room 2115, Dobbs Building, 430 Salisbury Street, Raleigh, North Carolina.

6. On October 26, 2021, the Public Staff filed the direct testimony of Thomas C. Williamson, Jr. and Michael C. Maness.

7. No other parties filed testimony in this proceeding.

8. On October 28, 2021, DENC filed its Affidavit of Publication.

9. On November 8, 2021, DENC filed a Letter in Lieu of Rebuttal Testimony.

10. A review of the pre-filed testimony of DENC and the Public Staff indicates that no conflicting positions exist between the Public Staff and DENC, and the parties agree on DENC's Rider C and Rider CE rates, as proposed by DENC.

11. The Public Staff and DENC have reached agreement on all issues, and each agrees to waive cross-examination of the other party's witnesses. As such, the Public Staff and DENC request that their respective witnesses be excused from appearing at the hearing scheduled for November 22, 2021, unless the Commission has questions for them.

12. In addition, due to the continued number of coronavirus cases, DENC and the Public Staff believe it is safer for the evidentiary hearing scheduled for Tuesday, November 22, 2021, to be conducted remotely via Webex.

13. Counsel for CIGFUR I and CUCA have also agreed to waive cross-examination of the Public Staff's and DENC's witnesses and consented to the evidentiary hearing being conducted remotely.

14. In light of the foregoing, the Public Staff and DENC respectfully request that the Commission issue an order rescheduling the evidentiary hearing in this matter for the same date but to be conducted by remote means and excusing

the Public Staff's and DENC's witnesses from appearing at the evidentiary hearing scheduled in this proceeding.

WHEREFORE, the Public Staff and DENC respectfully move:

1. That the Commission excuse Michael T. Hubbard, Edmund J. Hall, Jarvis E. Bates, Justin A. Wooldridge, Christopher C. Hewett, Casey R. Lawson, Thomas C. Williamson, Jr., and Michael C. Maness from appearing at the hearing on November 22, 2021, unless the Commission has questions for any of these witnesses;
2. That the Commission accept these witnesses' pre-filed testimony and exhibits into the record;
3. That the Commission reschedule the November 22, 2021 evidentiary hearing in this matter to be held on the same date by remote means; and
4. That the Commission grant further relief as the Commission deems just and proper.

Respectfully submitted this the 16th day of November, 2021.

PUBLIC STAFF
Christopher J. Ayers
Executive Director

Dianna W. Downey
Chief Counsel

Electronically submitted
s/ Nadia L. Luhr
Staff Attorney
4326 Mail Service Center
Raleigh, North Carolina 27699-4300
Telephone: (919) 733-6110
nadia.luhr@psncuc.nc.gov

/s/Andrea R. Kells
Andrea R. Kells
McGuireWoods LLP
501 Fayetteville Street, Suite 500
Raleigh, North Carolina 27601
Telephone: (919) 755-6614
akells@mcguirewoods.com

*Attorney for Virginia Electric and Power
Company, d/b/a Dominion Energy North
Carolina*

CERTIFICATE OF SERVICE

I certify that a copy of this Motion has been served on all parties of record or their attorneys, or both, 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 16th day of November, 2021.

Electronically submitted
/s/ Nadia L. Luhr
Staff Attorney