

**STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH**

DOCKET NO. G-9, SUB 752

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of Application of Piedmont Natural Gas) Company, Inc., for Annual Review of) Gas Costs Pursuant to N.C. Gen. Stat.) § 62-133.4(c) and Commission Rule) R1-17(k)(6))	MOTION TO EXCUSE APPEARANCE OF PUBLIC STAFF WITNESSES AND ACCEPT TESTIMONY
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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 the Public Staff’s witnesses at the hearing scheduled in this proceeding for October 1, 2019, and (2) allowing the introduction of all prefiled joint testimony and appendices into the record at such hearing without the appearance of such witnesses. In support of this request, Public Staff respectfully shows unto the Commission as follows:

1. This proceeding is Piedmont’s annual gas cost review proceeding in which the Commission receives testimony and rules on the prudence of Piedmont’s incurrence of gas costs for the 12 months ended May 31, 2019, and the propriety of its accounting for such costs during such period.

2. On August 1, 2019, Piedmont prefiled the testimony and exhibits of Sarah E. Stabley, Gennifer J. Raney, and MaryBeth Tomlinson in this proceeding in which these witnesses attested to the prudence of Piedmont’s gas costs during the review period and the propriety of its accounting for such costs. On

August 16, 2019, Piedmont filed the Supplemental Testimony of MaryBeth Tomlinson.

3. On September 16, 2019, the Public Staff filed the joint testimony of Poornima Jayasheela, Zarka H. Naba, and Julie G. Perry. Carolina Utility Customers Association, Inc. (CUCA) – the only other party to this proceeding – did not file testimony.

4. Based upon a review of the filed testimony, there does not appear to be any matter in dispute between the parties who have filed testimony in this proceeding.

5. Counsel for the Public Staff has conferred with counsel for Piedmont 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 October 1, 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 24th day of September, 2019.

PUBLIC STAFF
Christopher J. Ayers
Executive Director

David T. Drooz
Chief Counsel

Electronically submitted
/s/ Elizabeth D. Culpepper
Staff Attorney

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CERTIFICATE OF SERVICE

I do hereby certify that I have this day served a copy of the foregoing upon each of the parties of record in this proceeding or their attorneys of record by emailing them an electronic copy or by causing a paper copy of the same to be hand-delivered or deposited in the United States Mail, postage prepaid, properly addressed to each.

This the 24th day of September, 2019.

Electronically submitted
/s/ Elizabeth D. Culpepper