

**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

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**MOTION TO EXCUSE  
WITNESSES, PROPOSED  
ORDER AND CROSS-  
EXAMINATION ESTIMATES  
FOR WITNESSES**

Piedmont Natural Gas Company, Inc. ("Piedmont" or the "Company"), through counsel, respectfully submits the following Motion to Excuse Witnesses in the above-captioned docket and provides the proposed order of appearance for witnesses and cross-examination estimates. In support of its Motion to Excuse Witnesses, Piedmont respectfully shows unto the Commission as follows:

**Background**

1. The hearing of this matter is set to begin at 2:00 pm on Monday, August 19, 2019 in the Commission's Hearing Room.

2. By Order issued on May 16, 2019, the Commission directed that "the Company shall consult with all other parties and file, no later than August 13, 2019, a list of witnesses to be called at the expert witness hearing, the order of witnesses, and each party's estimated time for cross-examination of each witness."

3. On August 12, 2019, Piedmont filed a Stipulation of settlement between Piedmont, the Public Staff – North Carolina Utilities Commission ("Public Staff"), the Carolina Utility Customers Association, Inc. ("CUCA"), and

the Carolina Industrial Group for Fair Utility Rates IV (“CIGFUR IV”) (collectively the “Stipulating Parties”). Pursuant to this Stipulation, which resolved all matters in this case as between the Stipulating Parties, they each agreed to waive cross-examination of the other’s witnesses.

#### **Motion to Excuse Witnesses**

4. Piedmont moves, by and with the consent of each of the parties to this proceeding, to excuse the attendance of the following witnesses from the expert hearing of this matter scheduled to begin on August 19, 2019, subject to the desire of the Commission to ask questions of such witnesses:

Piedmont witness Daniel P. Yardley (Rate Design)

Piedmont witness Paul M. Norman (Lead/Lag Study)

Piedmont witness Dane A. Watson (Depreciation)

CIGFUR IV witness Nicholas Phillips (Cost of Capital/Rate Design)

5. Many of these witnesses will be required to travel to North Carolina to attend the hearing of this matter and it is the opinion of counsel for the parties that such travel is unnecessary at least for the parties’ purposes in this docket.

6. The parties to this proceeding, by and through their designated counsel, have indicated to the undersigned counsel for Piedmont either that they have no plans to conduct cross-examination of the above-identified witnesses or have waived the right to conduct such cross-examination in the settlement Stipulation filed on August 12, 2019.

7. Similarly, the parties to this proceeding, by and through their designated counsel, have indicated to the undersigned counsel for Piedmont

that they consent to the entry of the prefiled testimonies of these witnesses into the record as if given orally from the stand and to the admission of the prefiled exhibits of these witnesses into evidence, all without the necessity for these witnesses to appear at the hearing of this matter.

8. Based on the foregoing but subject to any countervailing desire of the Commission to ask these witnesses questions at the hearing of this matter, Piedmont, with the support of each of the parties to this proceeding, respectfully requests that these witnesses be excused from appearing at the August 19, 2019 expert witness hearing in this matter.

#### **Order of Witnesses and Cross-Examination Estimates**

9. Assuming the foregoing motion to excuse witnesses is granted, the parties to this proceeding propose the following order of testimony of the remaining witnesses in this docket with estimated cross-examination times indicated by party:

##### Piedmont

Frank Yoho

Victor M. Gaglio

Jack L. Sullivan, III

Kally A. Couzens

Robert B. Hevert

AG – 3.5 hours

Bruce P. Barkley

AG – 30 minutes

Pia Powers

AG – 30 minutes

##### CUCA

Kevin W. O'Donnell

AG – 50 minutes

Attorney General

J. Randall Woolridge

Piedmont – 1.5 hours

Public Staff

John R. Hinton

Julie G. Perry

FPWC – 30 minutes

AG – 30 minutes

Accounting Panel:

Poornima Jayasheela

Mary A. Coleman

R. Tyler Allison

Lynn Feasel

Engineering Panel:

Jan A. Larsen

Neha Patel

AG – 15 minutes

Geoffrey M. Gilbert

Zarka H. Naba

WHEREFORE, on behalf of the parties to this proceeding, Piedmont respectfully requests that the Commission enter an order excusing the witnesses identified above from appearing at the expert witness hearing in

this matter and permitting the entry of their prefiled testimony and exhibits into the record without such appearance.

This the 14<sup>th</sup> day of August, 2019.

**Piedmont Natural Gas Company, Inc.**

s/ James H. Jeffries IV  
James H. Jeffries IV

OF COUNSEL:

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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 14<sup>th</sup> day of August, 2019.

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