

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

DOCKET NO. E-34, SUB 54)
)
 In the Matter of)
 Application of Appalachian State University,)
 d/b/a New River Light and Power Company)
 for Adjustment of General Base Rates and)
 Charges Applicable to Electric Service)

**MOTION FOR SUBSTITUTION
OF WITNESS AND ADOPTION
OF TESTIMONY**

DOCKET NO. E-34, Sub 55)
)
 In the Matter of Petition of)
 Appalachian State University d/b/a New)
 River Light and Power Company for an)
 Accounting Order to Defer Certain Capital)
 Costs and New Tax Expenses)

NOW COMES the Public Staff – North Carolina Utilities Commission (“Public Staff”) pursuant to North Carolina Utilities Commission (“Commission”) Rules R1-5 and R1-7, and respectfully moves to substitute Fenge Zhang as the sponsor of the testimony and exhibit pre-filed in the above-captioned proceeding by Sonja Johnson and Iris Morgan.

In support of this motion, the Public Staff respectfully shows the Commission the following:

1. On November 8, 2022, Appalachian State University d/b/a New River Light & Power Company (NRLP or Company) filed its Petition for an Accounting Order to Defer Certain Capital-Related Costs and Tax Expenses in Docket No. E-34, Sub 55.

2. On December 22, 2022, NRLP filed its Application to Adjust Retail Base Rates.
3. On February 1, 2023, the Commission entered an order granting NRLP's motion to consolidate Docket Nos. E-34, Sub 54 and E-34, Sub 55 filed on January 18, 2023.
4. On March 20, 2023, the Commission issued an Order scheduling this matter to be heard on July 10, 2023, at 2:00 P.M.
5. On June 9, 2023, the Public Staff filed the testimony and exhibits of witnesses John R. Hinton and Jack Floyd and the joint testimony and exhibit of witnesses Sonja Johnson and Iris Morgan.
6. On July 6, 2023, the Public Staff and NRLP filed an Agreement and Stipulation of Settlement (Stipulation) resolving all issues between the Public Staff and NRLP.
7. On July 6, 2023, Public Staff accounting witness Fenge Zhang filed settlement testimony in support of the accounting and revenue requirement issues contained within the Stipulation.
8. As set forth in her testimony Fenge Zhang is the Public Utilities Regulatory Manager with the Accounting Division of the Public Staff, and is familiar with the subject matter of these combined dockets and with the content of Ms. Johnson's and Ms. Morgan' pre-filed testimony. Additionally, she will be able to answer questions from NRLP, the intervenors, and the

Commission at the expert witness hearing in the same capacity as Ms. Johnson and Ms. Morgan.

9. Allowing Ms. Zhang to adopt the pre-filed testimony and exhibit of Ms. Johnson and Ms. Morgan and substitute as a witness at the hearing would allow the July 10, 2023 hearing to proceed more efficiently through presentation of fewer Public Staff witnesses and would allow for a more efficient use of Public Staff personnel on other pending matters.

10. Given that Ms. Zhang would adopt the testimony and exhibit previously pre-filed by Ms. Johnson and Ms. Morgan in these dockets, no party will be prejudiced by this Motion.

11. The Public Staff notified NRLP and all intervenors regarding this motion and no party objected to this motion or the relief requested herein.

WHEREFORE, the Public Staff respectfully requests that Ms. Zhang be substituted as the sponsor of the testimony and exhibit of Sonja Johnson and Iris Morgan pre-filed in this proceeding and that she be permitted to testify in place of Ms. Johnson and Ms. Morgan at the hearing on this matter.

Respectfully submitted this 6th day of July, 2023.

PUBLIC STAFF
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Electronically Submitted
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CERTIFICATE OF SERVICE

I certify that I have served a copy of the foregoing motion on all parties of record in accordance with Commission Rule R1-39, by United States mail, postage prepaid, first class; by hand delivery; or by means of facsimile or electronic delivery upon agreement of the receiving party.

This, the 6th day of July, 2023.

Electronically submitted
/s/ Thomas Felling