

November 21, 2023

VIA Electronic Filing

Ms. A. Shonta Dunston, Chief Clerk
North Carolina Utilities Commission
Dobbs Building
430 North Salisbury Street
Raleigh, North Carolina 27603

Re: *Virginia Electric and Power Company, d/b/a Dominion Energy
North Carolina Application for Authority to Adjust its Electric Rates
and Charges and Revise its Fuel Factor Pursuant to G.S. 62-133.2
and Commission Rule R8-55
Docket No. E-22, Sub 675*

Dear Ms. Dunston:

Enclosed for filing in the above-referenced proceeding is the *Joint Motion to Excuse Witnesses and Cancel Evidentiary Hearing*.

Thank you for your assistance with this matter. Feel free to contact me with any questions about this filing.

Sincerely,

/s/Mary Lynne Grigg

MLG:tl

Enclosure

**STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH**

DOCKET NO. E-22, SUB 675

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of)	
Virginia Electric and Power Company, d/b/a)	JOINT MOTION TO EXCUSE
Dominion Energy North Carolina Application for)	WITNESSES AND CANCEL
Authority to Adjust its Electric Rates and Charges)	EVIDENTIARY HEARING
and Revise its Fuel Factor Pursuant to G. S. 62-133.2)	
and Commission Rule R8-55)	

NOW COME Virginia Electric and Power Company, d/b/a Dominion Energy North Carolina (“DENC”), the Public Staff – North Carolina Utilities Commission (“Public Staff”), and Carolina Industrial Group for Fair Utility Rates I (“CIGFUR I”) and, together, respectfully request that the North Carolina Utilities Commission (“Commission”) issue an order in the above-captioned proceeding excusing DENC’s and the Public Staff’s witnesses from appearing at the evidentiary hearing scheduled in this proceeding for November 28, 2023, and to cancel the evidentiary hearing.

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

1. On August 15, 2023, DENC filed its application for approval to adjust the fuel component of its electric rates to become effective February 1, 2024, and remain in effect through January 31, 2025 (“Application”) along with the pre-filed testimony of Jeffrey D. Matzen, James Holloway, Alan J. Moore, Dale E. Hinson, Christopher D. Clemens, and Timothy P. Stuller in support of the Application.
2. On August 23, 2023, Carolina Utility Customers Association (“CUCA”) filed a Petition to Intervene. The Commission granted the petition on August 28, 2023.

3. On August 25, 2023, CIGFUR I filed a Petition to Intervene. The Commission granted the petition on August 28, 2023.
4. On August 30, 2023, the Commission issued its *Order Scheduling Hearing, Requiring Filing of Testimony, Establishing Discovery Guidelines, and Requiring Public Notice (Fuel)* (“Scheduling Order”).
5. On September 7, 2023, the Commission issued its *Amended Order Scheduling Hearing, Requiring Filing of Testimony, Establishing Discovery Guidelines, and Requiring Public Notice (Fuel)* (“Scheduling Order”).
6. On September 21, 2023, Nucor Steel-Hertford filed a Petition to Intervene. The Commission granted the petition on September 26, 2023.
7. On September 28, 2023, DENC filed an Errata Application for a Change in Fuel Component of Electric Rates.
8. On November 3, 2023, DENC filed the Supplemental Testimony of Timothy P. Stuller.
9. On November 7, 2023, the Public Staff filed the testimony of Evan Lawrence and Darrell Brown.
10. On November 7, 2023, CIGFUR I filed the testimony of Brian C. Collins.
11. On November 9, 2023, the Company filed its Affidavit of Publication.
12. On November 16, 2023, DENC filed the Rebuttal Testimony of Timothy P. Stuller and Alan J. Moore.
13. No other parties filed testimony in this proceeding.
14. On November 21, 2023, the Company filed a letter with the Commission

informing the Commission that the Company recently discovered an error in its calculation of its fuel-related costs in this proceeding. DENC inadvertently failed to include certain capacity costs from solar facilities for the months of March through September 2023 that would otherwise be properly included in the Rider A costs. The Company and the Public Staff agreed that the review of the matter is not complete. Given the various fuel deadlines in this proceeding and the time available before the hearing, the Company and Public Staff have agreed to hold over consideration and potential recovery of these costs to DENC's 2024 fuel filing.

15. A review of the pre-filed testimony of DENC, CIGFUR I, and the Public Staff indicates that no conflicting positions exist between the Public Staff, DENC, and CIGFUR I, and these parties agree on the Company's Rider A, Rider B, and Rider B-1 rates, as set forth in Witness Stuller's rebuttal testimony.

16. DENC, the Public Staff, and CIGFUR I have reached agreement on all issues, and each agrees to waive cross-examination of the other parties' witnesses. As such, DENC, the Public Staff, and CIGFUR I request that their respective witnesses be excused from appearing at the hearing scheduled for November 28, 2023, pursuant to the Scheduling Order, unless the Commission has questions for them, and that the evidentiary hearing be canceled.

17. Counsel for CUCA and Nucor have also agreed to waive cross-examination of DENC's, the Public Staff's, and CIGFUR I's witnesses and have indicated that it does not object to this motion to excuse.

Therefore, the DENC, the Public Staff, and CIGFUR I respectfully move:

1. That the Commission excuse the witnesses for DENC, the Public Staff, and

CIGFUR I from appearing at the hearing on November 28, 2023, unless the Commission has questions for any of these witnesses, and cancel the evidentiary hearing;

2. That the pre-filed testimony and exhibits of the respective witnesses be received into evidence and made part of the record in this matter; and

3. That the Commission grant further relief as the Commission deems just and proper.

Respectfully submitted this the 21st day of November, 2023.

/s/ Mary Lynne Grigg

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing Joint Motion to Excuse Witnesses and Cancel Evidentiary Hearing, as filed in Docket No. E-22, Sub 675, were served electronically or via U.S. mail, first-class, postage prepaid, upon all parties of record.

This, the 21st day of November, 2023.

/s/Mary Lynne Grigg

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