McGuireWoods LLP 501 Fayetteville St. Suite 500 Raleigh, NC 27601 Phone: 919.755.6600 Fax: 919.755.6699 www.mcguirewoods.com



mgrigg@mcguirewoods.co

March 31, 2022

VIA Electronic Filing

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

> Re: Docket No. G-39, Sub 47

> > Public Service Company of North Carolina, Inc. Petition to Intervene

Dear Ms. Dunston:

Enclosed on behalf of Public Service Company of North Carolina, Inc. is its <u>Petition to Intervene of Public Service Company of North Carolina, Inc.</u> for filing in the above-captioned proceeding.

Should you have any questions, please do not hesitate to contact me. Thank you for your assistance in this matter.

Very truly yours,

/s/Mary Lynne Grigg

MLG:sjg

Enclosure

STATE OF NORTH CAROLINA UTILITIES COMMISSION RALEIGH

DOCKET NO. G-39, SUB 47

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of)) PETITION TO INTERVENE OF) PUBLIC SERVICE COMPANY OF) NORTH CAROLINA, INC.
Application of Cardinal Pipeline	``	
Company, LLC for an Adjustment of)	
Rates and Charges in North Carolina)	

Public Service Company of North Carolina, Inc. ("PSNC"), through counsel and pursuant to Rule R1-19 of the Rules and Regulations of the North Carolina Utilities Commission ("Commission"), respectfully requests the Commission allow its Petition to Intervene in this docket. In support of this Petition, PSNC shows the Commission the following:

1. Any notices or other communications with respect to this Petition should be sent to:

B. Craig Collins
Dominion Energy Services, Inc.
MC C222
220 Operation Way
Cayce, SC 29033-3701
Telephone: (803) 217-7513
bcollins@dominonenergy.com

and

Mary Lynne Grigg McGuireWoods LLP 501 Fayetteville Street, Suite 500 Raleigh, NC 27601 Telephone: (919) 755-6573 mgrigg@mcguirewoods.com

- 2. PSNC is a corporation duly organized and existing under the laws of the State of South Carolina, having its principal office and place of business in Gastonia, North Carolina. PSNC operates a natural gas pipeline system for the transportation, distribution, and sale of natural gas to more than 600,000 customers within a certificated service area consisting of all or parts of twenty-eight (28) counties in central and western North Carolina as designated in PSNC's certificates of public convenience and necessity issued by this Commission.
- 3. On March 15, 2022, Cardinal Pipeline Company, LLC. ("Cardinal") filed its application to adjust its rates and charges.
- 4. PSNC is a customer of Cardinal and will be directly affected by the outcome of this proceeding. PSNC is also the indirect owner of an equity interest in Cardinal. Therefore, PSNC has a valid and substantial interest in this proceeding. This interest cannot be adequately represented by any other party to this proceeding.

WHEREFORE, based on the foregoing, PSNC respectfully requests the Commission issue an order allowing it to intervene and fully participate in this proceeding in all respects.

This the 31st day of March, 2022.

/s/Mary Lynne Grigg

Mary Lynne Grigg McGuireWoods LLP 501 Fayetteville Street, Suite 500 Raleigh, North Carolina 27601 Telephone: (919) 755-6573 mgrigg@mcguirewoods.com

Attorney for Public Service Company of North Carolina, Inc.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing <u>Petition to Intervene of Public</u>

<u>Service Company of North Carolina, Inc.</u>, as filed in Docket No. G-39, Sub 47, was served via electronic delivery or mailed, first-class, postage prepaid, upon all parties of record.

This, the 31st day of March, 2022.

/s/Mary Lynne Grigg

Mary Lynne Grigg McGuireWoods LLP 501 Fayetteville Street, Suite 500 PO Box 27507 (27611) Raleigh, North Carolina 27601 Telephone: (919) 755-6573 mgrigg@mcguirewoods.com

Attorney for Public Service Company of North Carolina, Inc., d/b/a Dominion Energy North Carolina