

**STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH**

DOCKET NO. G-9, SUB 791

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.G.S. §) 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 11, 2021, and (2) allowing the introduction of the Public Staff’s corrected joint testimony 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, 2021, and the propriety of its accounting for such costs during such period.

2. On August 2, 2021, Piedmont filed the testimony and exhibits of Todd Breece, Jeffrey Patton, and MaryBeth Tomlinson. These witnesses attested to the prudence of Piedmont’s gas costs during the review period and the propriety of its accounting for such costs.

3. On August 9, 2021, Piedmont filed Exhibit_(MBT-5) to its witness Tomlinson's testimony.

4. On October 1, 2021, the Public Staff filed the joint testimony of James M. Singer, Dustin R. Metz, and Sonja R. Johnson.

5. On October 5, 2021, the Public Staff filed the corrected joint testimony of its witnesses.

6. There are no other parties to this proceeding.

7. Based upon a review of the filed testimony, there does not appear to be any matter in dispute between Piedmont and the Public Staff in this proceeding.

8. Counsel for the Public Staff has conferred with counsel for Piedmont. Piedmont has agreed to (a) waive cross-examination of the Public Staff's witnesses, (b) consent to the introduction of the Public Staff's corrected joint testimony into the record without the necessity for the appearance of such witnesses, and (c) 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 the Public Staff witnesses at the hearing scheduled in this docket for October 11, 2021, and (2) accepting the prefiled corrected joint testimony of the Public Staff witnesses into the record of this proceeding without requiring the appearance of any such witnesses.

Respectfully submitted, this the 5th day of October, 2021.

PUBLIC STAFF
Christopher J. Ayers
Executive Director

Dianna W. Downey
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 5th day of October, 2021.

Electronically submitted
/s/ Elizabeth D. Culpepper