STATE OF NORTH CAROLINA UTILITIES COMMISSION RALEIGH

DOCKET NO. E-22, Sub 558

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of Application of Virginia)	
Electric Power Company, d/b/a)	JOINT MOTION OF NUCOR
Dominion Energy North Carolina)	STEEL-HERTFORD AND CIGFUR
Pursuant to N.C.G.S.§ 62-133.2 and)	I FOR EXTENSION OF TIME
Commission Rule R8-55 Regarding)	
Fuel and Fuel-Related Cost Adjustments)	
for Electric Cities	•	

NOW COME Intervenors Nucor Steel-Hertford, a Division of Nucor Corporation ("Nucor"), and Carolina Industrial Group for Fair Utility Rates I (CIGFUR I), collectively the "Movants"), by and through their undersigned attorneys, and jointly move the Commission for an order extending the time within which the Public Staff and Intervenors must file direct testimony in this docket by one working day, until Friday, October 26, 2018, and to correspondingly extend the time for Dominion Energy North Carolina ("DENC") to file rebuttal testimony. In support thereof, Movants show the Commission the following:

- 1. CIGFUR I moved to intervene in this docket on October 15, 2018. Nucor moved to intervene in this docket on Tuesday, October 23, 2018. CIGFUR I and Nucor were allowed to intervene by Orders entered in this docket today. Collectively, the Movants comprise the industrial customers served by DENC.
- 2. By its order entered in this docket on October 2, 2018, the Commission ordered that the direct testimony and exhibits of the expert witnesses for the Public Staff and Intervenors be filed by October 25, 2018, and that the rebuttal testimony and exhibits of DENC's expert witnesses be filed by Friday, November 2, 2018.

- 3. As Intervenors, Movants often do not determine whether to engage expert witnesses until after the issues likely to be controverted become more clear.
- 4. Based on the application DENC filed in this docket, the need for Movants to engage expert witnesses in this docket was not immediately clear.
- 5. Movants only recently determined the issues likely to be controverted and that expert witnesses would need to be engaged.
- 6. Movants are working diligently to complete expert testimony to address the issue of concern to them.
- 7. Despite their diligence, Movants need additional time to complete and file the testimony of their expert witnesses, and seek one additional working day to do so, until Friday, October 26, 2018.
- 8. Movants have confirmed that the Public Staff has no objection to the requested extension, and have also confirmed that DENC has no objection to the extension requested herein, so long as the deadline for DENC to file its rebuttal testimony is correspondingly extended.

Wherefore, Movants respectfully request that the Commission enter an order extending the time up to and including Friday, October 26, 2018, within which the Public Staff and Intervenors must file the direct testimony and exhibits of their experts for this proceeding, and to correspondingly extend the time for DENC to file the rebuttal testimony and exhibits of its experts.

Respectfully submitted this 25th day of October, 2018.

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CERTIFICATE OF SERVICE

The undersigned attorney for Nucor Steel-Hertford hereby certifies that he served the foregoing Joint Motion of Nucor Steel-Hertford and CIGFUR I for Extension of Time upon the parties of record in this proceeding by electronic mail and/or depositing copies in the United States mail, postage prepaid.

This the 25 day of October, 2018.

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