

**STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH**

DOCKET NO. E-22, SUB 578

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of		
Application of Virginia Electric and Power)	
Company, d/b/a Dominion Energy North)	
Carolina for Approval of Renewable Energy)	
and Energy Efficiency Portfolio Standard Cost)	JOINT MOTION TO
Rider Pursuant to N.C.G.S. § 62- 133.8 and)	EXCUSE WITNESSES
Commission Rule R8-67)	

NOW COMES THE PUBLIC STAFF – North Carolina Utilities Commission (“Public Staff”), by and through its Executive Director, Christopher J. Ayers, and respectfully requests on behalf of Virginia Electric and Power Company, d/b/a Dominion Energy North Carolina (“DENC” or the “Company”) and itself for the Commission to issue an order in the above-captioned docket excusing the witnesses in this proceeding. The Company has authorized the Public Staff to state that it joins with the Public Staff in this motion.

In support of this motion, the Public Staff shows as follows:

1. On August 13, 2019, DENC filed its application for approval to recover the Company’s Renewable Energy and Energy Efficiency Portfolio Standard (“REPS”) compliance and related costs, along with the pre-filed testimony and exhibits of George E. Hitch, Alan J. Moore, and Emilia L. Catron in support of its Application.

2. On September 4, 2019, the Commission issued an *Order Scheduling Hearing, Requiring Filing of Testimony, Establishing Discovery Guidelines, and Requiring Public Notice*, which set the public hearing date for Tuesday, November 12, 2019.

3. On October 22, 2019, the Public Staff filed the affidavits of Tommy C. Williamson and Jenny X. Li. In its notice of affidavits, the Public Staff stated that the affiants will not be called to testify orally and will not be subject to cross-examination unless an opposing party or the Commission demands the right of cross-examination by notice mailed or delivered to the proponent at least five days prior to the hearing, pursuant to N.C. Gen. Stat. § 62-68.

4. On October 25, 2019, DENC filed the supplemental testimony and exhibits of Alan J. Moore and Emilia L. Catron.

5. October 28, 2019, the Public Staff filed the revised affidavits of Tommy C. Williamson and Jenny X. Li.

6. On October 31, 2019, DENC filed its Letter in Lieu of Rebuttal, indicating that the Public Staff's revised affidavits recommended that the Commission approve Riders RP and RPE as proposed in the Company's supplemental testimony.

7. No other parties have intervened in this proceeding.

8. For purposes of the present proceeding, the Company and the Public Staff are in agreement regarding the Company's REPS compliance and related costs, as presented in the Company's testimony and the Public Staff's affidavits.

9. Thus, the Public Staff and the Company have reached agreement on all the issues and each agrees to waive cross-examination of the other party's witnesses. Accordingly, the Public Staff and the Company request that their respective witnesses be excused from appearing at the hearing scheduled for November 12, 2019, unless the Commission has questions for them.

10. The Public Staff and the Company further request that the pre-filed testimony, exhibits, and affidavits of the respective witnesses be received into evidence and made part of the record in this matter.

Therefore, the Public Staff and the Company move:

1. That the Commission excuse the witnesses for the Public Staff and the Company from appearing at the hearing on November 12, 2019, unless the Commission has questions for any of the witnesses.
2. That the pre-filed testimony, exhibits, and affidavits of the respective witnesses be received into evidence and made part of the record in this matter.
3. That the Commission grant such other relief as the Commission deems just and proper.

Respectfully submitted, this the 6th day of November, 2019.

PUBLIC STAFF
Christopher J. Ayers
Executive Director

David Drooz
Chief Counsel

Electronically submitted
/s/ Tim R. Dodge
Staff Attorney

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CERTIFICATE OF SERVICE

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

This the 6th day of November, 2019.

Electronically submitted
s/ Tim R. Dodge