

February 24, 2023

**VIA ELECTRONIC FILING**

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

**Re: Docket No. G-40, Sub 171**

Dear Ms. Dunston:

Enclosed for filing is the *Joint Motion to Excuse Appearance of Witnesses and Accept Testimony* on behalf of Frontier Natural Gas Company and the Public Staff in the above-referenced docket.

Thank you for your assistance with this matter. If you have any questions regarding this filing, you may reach me at the number shown above.

Sincerely,

/s/ Brian L. Franklin  
Brian L. Franklin

BLF/bms

Enclosure

cc: Elizabeth Culpepper  
Gina C. Holt  
Megan Jost  
Nathan Bell  
James H. Jeffries IV  
Mason Maney

**BEFORE THE NORTH CAROLINA UTILITIES COMMISSION**

**DOCKET NO. G-40, SUB 171**

In the Matter of )  
 )  
 Application of Frontier Natural Gas )  
 Company for Annual Review of Gas )  
 Costs Pursuant to N.C. Gen. Stat. § 62- )  
 133.4(c) and Commission Rule R1- )  
 17(k)(6) )  
 )

**JOINT MOTION TO EXCUSE  
 APPEARANCE OF WITNESSES  
 AND ACCEPT TESTIMONY**

Now comes Frontier Natural Gas Company (“Frontier” or the “Company”) and the Public Staff – North Carolina Utilities Commission (“Public Staff”), and jointly move the North Carolina Utilities Commission (“Commission”) for an order (1) excusing the appearance of all witnesses at the hearing scheduled in this proceeding for March 14, 2023, and (2) allowing the introduction of all prefiled testimony and exhibits into the record at such hearing without the appearance of witnesses. In support of this motion, Frontier and the Public Staff respectfully show unto the Commission as follows:

1. This proceeding is Frontier’s annual gas cost review proceeding in which the Commission receives testimony and rules on the prudence of Frontier’s incurrence of gas costs for the 12 months ended September 30, 2022, and the propriety of its accounting for such costs during such period.

2. On December 1, 2022, Frontier prefiled the direct testimony and exhibits of Taylor B. Younger and the direct testimony and schedules of Nathan Bell. These witnesses attested to the prudence of Frontier’s gas costs during the review period and the propriety of its accounting for such costs.

3. On December 6, 2022, the Commission issued an Order Scheduling Hearing, Requiring Filing of Testimony, Establishing Discovery Guidelines and Requiring Public Notice, setting this matter for hearing on March 7, 2023.

4. On January 9, 2023, Frontier prefiled the supplemental direct testimony and exhibits of Nathan Bell.

5. On January 18, 2023, Frontier prefiled an errata to the supplemental direct testimony of Nathan Bell.

6. On January 23, 2022, the Commission issued an Order Rescheduling Expert Witness hearing to March 14, 2023.

7. On February 20, 2023, the Public Staff filed the direct testimony of Blaise C. Michna, and the joint direct testimony of Hemanth Meda and Sonja R. Johnson.

8. There are no other parties to this proceeding.

9. Based upon a review of the testimony, it does not appear that there are any matters in dispute between Frontier and the Public Staff in this proceeding.

10. Counsel for Frontier and the Public Staff have conferred with respect to the lack of issues in this proceeding and have agreed to (a) waive cross-examination of each other's witnesses, (b) consent to the introduction of the other's party's testimony and exhibits into the record without the necessity for the appearance of such witnesses, and (c) jointly seek the excusal of witnesses from appearance at the hearing of this matter.

WHEREFORE, Frontier and the Public Staff respectfully request that the Commission enter an order (1) excusing the appearance of all witnesses at the expert witness hearing scheduled in this docket for March 14, 2023, and (2) accepting the prefiled

testimony and exhibits of all witnesses into the record of this proceeding without requiring their appearance.

Respectfully submitted, this the 24th day of February, 2023.

Frontier Natural Gas Company

/s/ Brian L. Franklin

Brian L. Franklin

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Public Staff – North Carolina Utilities Commission

/s/ Gina C. Holt

Gina C. Holt

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the attached *Joint Motion to Excuse Appearance of Witnesses and Accept Testimony* is being served this date upon all parties to this docket electronically or by depositing a copy of the same in the United States Mail, First Class Postage Prepaid, at the addresses contained in the official service list in this proceeding.

This, the 24th day of February, 2023.

/s/ Brooke M. Szymanski  
Brooke M. Szymanski