

DOCKET NO. G-40, SUB 163

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of
Application of Frontier Natural Gas) JOINT MOTION TO EXCUSE
Company for Annual Review of Gas Costs) APPEARANCE OF WITNESSES
Pursuant to N.C. Gen. Stat. §) AND ACCEPT TESTIMONY
62-133.4(c) and Commission Rule)
R1-17(k)(6))

Frontier Natural Gas Company (Frontier) and the Public Staff – North Carolina Utilities Commission (Public Staff), through counsel, hereby jointly move the Commission for an order (1) excusing the appearance of witnesses at the hearing scheduled in this proceeding for March 1, 2022, 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 request, 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, 2021, and the propriety of its accounting for such costs during such period.

2. On December 1, 2021, Frontier prefiled the testimony and exhibits of Taylor B. Younger and 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 February 14, 2022, the Public Staff filed the testimony of Jordan A. Nader, R. Tyler Allison, and Sonja R. Johnson.

4. On February 15, 2022, the Public Staff filed the corrected testimony of Public Staff witness Allison.

5. There are no other parties to this proceeding.

6. 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.

7. Counsel for Frontier and the Public Staff have conferred with respect to the lack of issues in this proceeding and have agreed (a) to waive cross-examination of each other's witnesses, (b) to 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) to 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 hearing scheduled in this docket for March 1, 2022, and (2) accepting the prefiled testimony and exhibits of all witnesses into the record of this proceeding without requiring the appearance of any such witnesses.

Respectfully submitted, this the 16th day of February, 2022.

Frontier Natural Gas Company

Electronically submitted

/s/ James H. Jeffries IV

James H. Jeffries IV

McGuireWoods LLP

201 North Tryon Street, Suite 3000

Charlotte, North Carolina 28202-2146

Telephone: 704-343-2348

jjeffries@mcguirewoods.com

Public Staff – North Carolina Utilities Commission

Electronically submitted

/s/ Elizabeth D. Culpepper

Staff Attorney

4326 Mail Service Center

Raleigh, North Carolina 27699-4300

Telephone: (919) 733-6110

elizabeth.culpepper@psncuc.nc.gov

CERTIFICATE OF SERVICE

I certify that I have this day served a copy of the foregoing on each of the parties of record in this proceeding or the attorney of record of such party in accordance with Commission Rule R1-39, by United States mail, first class or better; by hand delivery; or by means of facsimile or electronic delivery upon agreement of the receiving party.

This the 16th day of February, 2022.

Electronically submitted

/s/ Richard K. Goley