

## BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

## DOCKET NO. M-100, SUB 164

|                                                  |   |                              |
|--------------------------------------------------|---|------------------------------|
| In the Matter of                                 | ) |                              |
| Consideration of the Federal Funding Available   | ) | <b>PETITION TO INTERVENE</b> |
| Under the Infrastructure investment and Jobs Act | ) | <b>ON FRONTIER NATURAL</b>   |
|                                                  | ) | <b>GAS COMPANY</b>           |
|                                                  | ) |                              |

Frontier Natural Gas Company (“Frontier”), through counsel and pursuant to Rule R1-19 of the Rules and Regulations of the North Carolina Utilities Commission (“Commission”), respectfully requests the Commission to enter an order permitting Frontier to intervene and participate in the above-captioned proceeding. In support of its Petition to Intervene, Frontier shows the Commission the following:

1. Any notices or other communications with respect to this Petition should be sent to:

James H. Jeffries IV  
 McGuireWoods LLP  
 201 North Tryon Street, Suite 3000  
 Charlotte, NC 28202  
 Telephone: 704-343-2348  
 Email: [jjeffries@mcguirewoods.com](mailto:jjeffries@mcguirewoods.com)

2. Frontier is a corporation duly organized and existing under the laws of the State of North Carolina, with its headquarters in Elkin, North Carolina. Frontier is a North Carolina public utility within the meaning of N.C. Gen. Stat. § 62- 3(23) whose operations within the state are subject to the provisions of Chapter 62 of the General Statutes and the jurisdiction of the Commission.

3. On February 1, 2022, the Commission issued its *Order Allowing Comments Regarding Federal Funding for Utility Service in North Carolina* (“Order”).

4. In the Order, the Commission stated that “parties may file written comments as provided herein on or before March 15, 2022, provided that each utility party is only required to comment on available federal programs as they pertain to its particular industry.”

5. As a local distribution company operating within the jurisdiction of this Commission, Frontier will be directly affected by the outcome of this proceeding. Therefore, Frontier has a valid and substantial interest in this proceeding. This interest cannot be adequately represented by other parties to this proceeding.

WHEREFORE, based on the foregoing, Frontier respectfully requests that the Commission issue an order allowing it to intervene and fully participate in the above-captioned proceeding.

Respectfully submitted, this the 10th day of March, 2022.

**Frontier Natural Gas Company**

/s/ James H. Jeffries IV  
James H. Jeffries IV  
McGuireWoods LLP  
201 North Tryon Street, Suite 3000  
Charlotte, NC 28202  
Telephone: 704-343-2348  
Email: [jjeffries@mcguirewoods.com](mailto:jjeffries@mcguirewoods.com)

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the attached is being served this date upon all of the 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 10th day of March, 2022.

/s/ Richard K. Goley  
Richard K. Goley