

**STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH**

DOCKET NO. G-5, SUB 635

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of)	
Application of Public Service)	
Company of North Carolina, Inc. for)	JOINT MOTION TO EXCUSE
Annual Review of Gas Costs)	APPEARANCE OF WITNESSES
Pursuant to N.C.G.S. § 62-133.4(c))	AND ACCEPT TESTIMONY
and Commission Rule R1-17(k)(6))	

NOW COME THE PUBLIC STAFF - North Carolina Utilities Commission (Public Staff), by and through its Executive Director, Christopher J. Ayers, and Public Service Company of North Carolina, Inc. (PSNC or the Company) and respectfully move the Commission for an order (1) excusing the appearance of all Public Staff witnesses and PSNC witness Glory J. Creel at the hearing scheduled in this proceeding for August 10, 2021 and (2) allowing the introduction of the Public Staff's and PSNC witness Creel's prefiled testimony, exhibit and appendices into the record at such hearing without the appearance of witnesses. In support of this request, the Public Staff respectfully shows unto the Commission as follows:

1. This proceeding is PSNC's annual gas cost review proceeding in which the Commission receives testimony and rules on the prudence of PSNC's incurrence of gas costs for the 12 months ended March 31, 2021, and the propriety of its accounting for such costs during such period.

2. On June 1, 2021, PSNC prefiled the testimony and exhibits of Rose M. Jackson and Glory J. Creel in this proceeding in which these witnesses attested to the prudence of PSNC's gas costs during the review period and the propriety of its accounting for such costs.

3. On July 9, 2021, Haw River Assembly (HRA) filed a Petition to Intervene, which was granted by the Commission on July 19, 2021.

4. On July 26, 2021, the Public Staff filed the testimony of Neha R. Patel, Shawn L. Dorgan, and Julie G. Perry.

5. On July 26, 2021, HRA filed the testimony and exhibits of Gregory M. Lander.

6. On July 29, 2021, PSNC filed a *Motion to Strike the Direct Testimony and Exhibits of Gregory M. Lander and Request for Expedited Treatment* (Motion to Strike).

7. On August 2, 2021, HRA filed its *Response of Haw River Assembly in Opposition to Public Service Company of North Carolina's Motion to Strike* (HRA Response).

8. The Public Staff has reviewed PSNC's Motion to Strike and HRA's Response and does not take a position as to those filings.

9. Counsel for the Public Staff and PSNC have conferred with counsel for Haw River Assembly and all parties have agreed to (a) waive cross-examination of the Public Staff's witnesses and PSNC witness Creel, (b) consent to the introduction of the Public Staff's and PSNC witness Creel's testimony,

exhibit, and appendices into the record without the necessity for the appearance of such witnesses, and (c) the excusal of the Public Staff's witnesses and PSNC witness Creel from appearance at the hearing of this matter.

WHEREFORE, the Public Staff and PSNC respectfully request that the Commission enter an order (1) excusing the appearance of all Public Staff witnesses and PSNC witness Creel at the hearing scheduled in this docket for August 10, 2021, and (2) accepting the prefiled testimony, exhibit, and appendices of all Public Staff witnesses and PSNC witness Creel into the record of this proceeding without requiring the appearance of any such witnesses.

Respectfully submitted, this the 3rd day of August, 2021.

PUBLIC STAFF
Christopher J. Ayers
Executive Director

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Electronically submitted
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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 3rd day of August, 2021.

Electronically submitted
/s/ Gina C. Holt