

**STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH**

DOCKET NO. G-9, SUB 722
DOCKET NO. G-9, SUB 781
DOCKET NO. G-9, SUB 786

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

DOCKET NO. G-9, SUB 722)	
)	
In the Matter of)	
Consolidated Natural Gas Construction)	
and Redelivery Services Agreement)	
Between Piedmont Natural Gas Company,)	
Inc., and Duke Energy Carolinas, LLC)	
)	
DOCKET NO. G-9, SUB 781)	
)	MOTION FOR
In the Matter of)	EXTENSION
Application of Piedmont Natural Gas)	OF TIME
Company, Inc., for an Adjustment of Rates,)	
Charges, and Tariffs Applicable to Service)	
in North Carolina)	
)	
DOCKET NO. G-9, SUB 786)	
)	
In the Matter of)	
Application of Piedmont Natural Gas)	
Company, Inc., for Modification to Existing)	
Energy Efficiency Program and Approval of)	
New Energy Efficiency Programs)	

NOW COMES THE PUBLIC STAFF – North Carolina Utilities Commission (Public Staff), by and through its Executive Director, Christopher J. Ayers, and moves the Commission for an extension of time for the filing of the direct testimony of intervenors and the Public Staff and for rebuttal testimony. In support of this motion, the Public Staff respectfully shows the Commission the following:

1. On March 22, 2021, Piedmont Natural Gas Company, Inc. (Piedmont or the Company), filed an application with the Commission in Docket No. G-9, Sub 781 requesting authority to adjust and increase its rates and charges for natural gas service in North Carolina.

2. On April 13, 2021, the Commission issued an Order Establishing General Rate Case and Suspending Rates.

3. Also on April 13, 2021, the Public Staff filed a Motion to Consolidate Dockets requesting that the Commission issue an order consolidating the previously consolidated Docket No. G-9, Sub 722, Piedmont's redelivery services agreement for Duke Energy Carolinas, LLC's Lincoln Plant, and Docket No. G-9, Sub 781 with Docket No. G-9, Sub 786, in which Piedmont filed a request for approval of modifications to its existing Equipment Rebate Program and of three new energy efficiency programs: Residential New Construction Program, Commercial Food Services Program, and Commercial HVAC & Water Heating Program. On April 19, 2021, the Commission issued an order granting the Public Staff's motion and consolidating the above-referenced dockets.

4. On May 17, 2021, the Commission issued its Order Scheduling Investigation and Hearings, Establishing Intervention and Testimony Due Dates and Discovery Guidelines, and Requiring Public Notice, specifying that the direct testimony and exhibits of intervenors and the Public Staff shall be filed on or before August 4, 2021, and that the rebuttal testimony and exhibits of the Company, if any, shall be filed on or before August 18, 2021.

5. The Public Staff has been working diligently on this matter, including conducting discovery and preparing its testimony, but needs additional time to review and address in its testimony recently-received and forthcoming data request responses from the Company. Therefore, the Public Staff will not be in a position to file testimony by August 4, 2021.

6. The Public Staff respectfully requests that the Commission extend the due date for the filing of the direct testimony and exhibits of intervenors and the Public Staff in this docket to August 11, 2021, and for the filing of the rebuttal testimony and exhibits of the Company, if any, to August 25, 2021.

7. The Public Staff contacted counsel for the parties. No party indicated that they objected to the proposed extensions.

WHEREFORE, for the reasons set forth above, the Public Staff respectfully requests that the Commission extend the time for filing intervenor and Public Staff testimony and exhibits to August 11, 2021, and for the filing of Company rebuttal testimony and exhibits, if any, to August 25, 2021.

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

PUBLIC STAFF
Christopher J. Ayers
Executive Director

Dianna W. Downey
Chief Counsel

Electronically submitted
/s/ Elizabeth D. Culpepper
Staff Attorney
elizabeth.culpepper@psncuc.nc.gov

Electronically submitted
/s/ Megan Jost
Staff Attorney
megan.jost@psncuc.nc.gov

4326 Mail Service Center
Raleigh, North Carolina 27699-4300
Telephone: (919) 733-6110

CERTIFICATE OF SERVICE

I do hereby certify that I have this day served a copy of the foregoing Motion upon each of the parties of record in this proceeding or their attorneys of record by emailing them an electronic copy or by causing a paper copy of the same to be hand-delivered or deposited in the United States Mail, postage prepaid, properly addressed to each.

This the 3rd day of August, 2021.

Electronically submitted
/s/ Elizabeth D. Culpepper
Elizabeth D. Culpepper