

**STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH**

DOCKET NO. G-40, SUB 160

In the Matter of
Joint Application of Frontier Natural Gas Company and Ullico Infrastructure
Hearthstone Holdco, LLC, for Approval of the Sale and Transfer of Stock) JOINT MOTION FOR
) ADDITIONAL
) EXTENSION
) OF TIME

Frontier Natural Gas Company (“Frontier”) and Ullico Infrastructure Hearthstone Holdco, LLC (“UIHH”) (collectively, the “Applicants”), through counsel, and the Public Staff – North Carolina Utilities Commission (“Public Staff”), through its Executive Director, Christopher J. Ayers, and jointly move the Commission for an extension of time for the filing of the direct testimony of the Public Staff. In support of this motion, the Movants respectfully show the following:

1. On January 27, 2021, the Applicants filed an application pursuant to N.C. Gen. Stat. § 62-111 for (1) approval of a transaction whereby Hearthstone Utilities Inc. (“HUI”) and its subsidiaries, including Frontier, will become wholly owned subsidiaries of UIHH, and (2) authorization and/or waiver as is necessary and appropriate to effect the proposed transaction.

2. On March 31, 2021, the Commission issued its *Order Scheduling Hearing, Establishing Procedural Deadlines and Requiring Public Notice*, specifying, among other things, that the direct testimony of the Public Staff and other intervenors shall be filed not later than May 24, 2021, and that the rebuttal testimony of the Applicants shall be filed not later than June 9, 2021.

3. On May 21, 2021, the Public Staff requested that the Commission extend the due date for the filing of Public Staff and other intervenor testimony in this docket to June 2, 2021, and for the filing of rebuttal testimony to June 15, 2021.

4. On May 24, 2021, the Commission granted the Public Staff's request.

5. Since the Commission granted the extension, the Public Staff has worked diligently preparing its testimony, and the Movants have been engaged in productive negotiations regarding the potential resolution of issues arising in this proceeding, including the adoption of regulatory conditions governing the proposed transaction. The Movants require additional time to finalize the ongoing negotiations and for the Public Staff to file its associated testimony.

6. The Movants respectfully request that the Commission extend the due date for the filing of Public Staff and other intervenor testimony in this docket to June 8, 2021. The Movants do not seek an extension for the filing of any rebuttal testimony or any other applicable deadline.

WHEREFORE, for the reasons set forth, the Movants respectfully requests that the Commission extend the time for filing Public Staff and other intervenor testimony to June 8, 2021.

Respectfully submitted, this the 1st day of June, 2021.

**ULLICO INFRASTRUCTURE
HEARTHSTONE
HOLDCO, LLC**

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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 1st day of June, 2021.

By: /s/ Craig D. Schauer
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