



MARCUS W. TRATHEN
1600 WELLS FARGO CAPITOL CENTER
150 FAYETTEVILLE STREET
RALEIGH, NC 27601

T 919.839.0300
F 919.839.0304
MTRATHEN@BROOKSPIERCE.COM

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Jan 27 2021

January 27, 2021

Via Electronic Filing

Ms. Kimberley A. Campbell
Chief Clerk
North Carolina Utilities Commission
4325 Mail Service Center
Raleigh, NC 27699-4300

**Re: Joint Application of Frontier Natural Gas Company and Ullico
Infrastructure Hearthstone Holdco, LLC for Approval of the
Sale and Transfer of Stock**
Docket No. G-40, Sub 160

Dear Ms. Campbell:

Pursuant to N.C. Gen. Stat. § 62-111(a) and Commission Rule R1-5, I enclose the Joint Application of Frontier Natural Gas Company (“Frontier”) and Ullico Infrastructure Hearthstone Holdco, LLC (the “Applicants”) for Approval of the Sale and Transfer of Stock along with the testimony of Sonia Axter, Fred Steele, and Kevin Degenstein (collectively the “Application”). As noted in the Application, Frontier is represented in this matter by James H. Jeffries IV of McGuireWoods LLP.

Pursuant to a Stock Purchase and Sale Agreement entered into by their parent entities, Ullico Infrastructure Hearthstone Holdco, LLC will acquire one hundred percent of the stock of GEP Bison Holdings, Inc., the parent of Hearthstone Utilities, Inc. and, in turn, Frontier. The transaction will result in a change of control of Frontier, which is a North Carolina utility and which requires Commission approval pursuant to N.C. Gen. Stat. § 62-111(a).

Please note that Exhibit B is being submitted separately under confidential seal. This exhibit contains confidential information relating to the business transaction between the Applicants’ parent entities and the related business, operations and assets. Public disclosure would harm Applicants’ position in the competitive market. Accordingly, the Applicants respectfully request that the confidential information be treated confidentially pursuant to N.C. Gen. Stat. § 132.1.2 and protected from public disclosure.

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Please do not hesitate to contact me or Mr. Jeffries should any questions arise in connection with this filing.

Sincerely,

BROOKS, PIERCE, McLENDON,
HUMPHREY & LEONARD, LLP

A handwritten signature in blue ink, appearing to read "Marcus W. Trathen", with a long horizontal flourish extending to the right.

Marcus W. Trathen

Enclosures

cc: Dianna Downey, Esq.
Jim Jeffries, Esq.