

McGuireWoods LLP
501 Fayetteville St.
Suite 500
PO Box 27507 (27611)
Raleigh, NC 27601
Phone: 919.755.6600
Fax: 919.755.6699
www.mcguirewoods.com

Mary Lynne Grigg
Direct: 919.755.6573

McGUIREWOODS

mgrigg@mcguirewoods.com

OFFICIAL COPY

Nov 10 2020

November 10, 2020

Ms. Kimberley A. Campbell, Chief Clerk
North Carolina Utilities Commission
Dobbs Building
430 North Salisbury Street
Raleigh, North Carolina 27603

Re: *In the Matter of Application by Virginia Electric and Power Company,
d/b/a Dominion Energy North Carolina, for Authority to Adjust its
Electric Rates and Charges and Revise its Fuel Factor Pursuant to N.C.
Gen. Stat. § 62-133.2 and NCUC Rule R8-55
Docket No. E-22, Sub 590*

Dear Ms. Campbell:

Enclosed for filing in the above-referenced docket on behalf of Virginia Electric and Power Company, d/b/a Dominion Energy North Carolina and the Public Staff of the North Carolina Utilities Commission is their Joint Motion to Excuse Witnesses.

Please do not hesitate to contact me if you have any questions regarding this filing. Thank you for your assistance with this matter.

Very truly yours,

/s/Mary Lynne Grigg

MLG:sjg

Enclosures

cc: John Little
William Creech

**STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH**

DOCKET NO. E-22, SUB 590

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of		
Application by Virginia Electric and Power)	
Company, d/b/a Dominion Energy North)	
Carolina, for Authority to Adjust its Electric)	JOINT MOTION TO EXCUSE
Rates and Charges and Revise its Fuel)	WITNESSES
Factor Pursuant to N.C. Gen. Stat. § 62-)	
133.2 and NCUC Rule R8-55)	

NOW COME Virginia Electric and Power Company, d/b/a Dominion Energy North Carolina (“DENC”) and the Public Staff – North Carolina Utilities Commission (“Public Staff”) and, together, respectfully request that the North Carolina Utilities Commission (“Commission”) issue an order in the above-captioned docket excusing DENC’s and the Public Staff’s witnesses from appearing at the evidentiary hearing scheduled in this proceeding.

In support of this Motion, DENC and the Public Staff show as follows:

1. On August 11, 2020, DENC filed its Application for Adjust its Electric Rates and Charges and Revise its Fuel Factor Pursuant to N.C. Gen. Stat. § 62-133.2 and NCUC Rule R8-55 (“Application”) along with the pre-filed testimony and exhibits of Jeffrey D. Matzen, Ronnie R. Campbell, Dale E. Hinson, Tom A Brookmire, and George G. Beasley in support of the Application.
2. On September 14, 2020, the Commission issued its *Order Scheduling Hearing, Establishing Testimony and Discovery Guidelines, and Requiring Public Notice*, which set the public hearing date for November 17, 2020.

3. On October 22, 2020, Carolina Industrial Group for Fair Utility Rates I (“CIGFUR I”) filed a Petition to Intervene. The Petition was granted on October 26, 2020.

4. On October 23, 2020, DENC filed Corrected Direct Testimony of Company Witness Beasley and Exhibit GGB-1.

5. Also, October 23, 2020 DENC filed the Petition for Waiver of Notice of Requirements, and on October 27, 2020 a Notarized Verification to Petition for Waiver of Notice of Requirements was filed.

6. On October 26, 2020, DENC, the Public Staff, and CIGFUR I filed separate consents to holding the public evidentiary hearing in this docket by remote means.

7. On October 27, 2020, the Commission granted the Petition for Waiver of Notice of Requirements and Requiring Amended Public Notice.

8. On November 2, 2020, the Public Staff filed the direct testimony of Evan D. Lawrence, Michael C. Maness and Jenny X. Li.

9. On November 9, 2020, DENC filed Rebuttal Testimony of Ronnie T. Campbell.

10. No other parties have intervened in this proceeding.

11. For purposes of the present proceeding, the Company and the Public Staff are in agreement regarding the Company’s fuel adjustment and related costs, as presented in DENC’s testimony and in the testimony and affidavit of the Public Staff. The Company and the Public Staff agree on the Company’s Rider A and EMF Rider B rates, as set forth in their respective testimony and affidavit, and there are no conflicting positions with regard to these issues in this docket. Thus, DENC and the Public Staff have reached

agreement on all the issues for purposes of this proceeding, and each agrees to waive cross-examination of the other party's witnesses.

12. Counsel for CIGFUR I has also agreed to waive cross-examination of DENC's and the Public Staff's witnesses and has indicated that it does not object to this motion to excuse.

13. Accordingly, DENC and the Public Staff request that their respective witnesses be excused from appearing at the hearing scheduled for November 17, 2020, unless the Commission has questions for them.

14. DENC and the Public Staff further request that the pre-filed testimony, exhibits, and affidavit of their respective witnesses be received into evidence and made part of the record in this matter.

Therefore, DENC and the Public Staff respectfully move:

1. That the Commission excuse the witnesses for DENC and the Public Staff from appearing at the hearing on November 17, 2020, unless the Commission has questions for any of these witnesses.

2. That the pre-filed testimony, exhibits, and affidavit of the respective witnesses be received into evidence and made part of the record in this matter.

3. That the Commission grant such other and further relief as the Commission deems just and proper.

Respectfully submitted, this the 10th day of November, 2020.

By: /s/Mary Lynne Grigg

Mary Lynne Grigg
McGuireWoods LLP
501 Fayetteville Street, Suite 500
PO Box 27507 (27611)
Raleigh, North Carolina 27601
Telephone: (919) 755-6573
mgrigg@mcguirewoods.com

*Counsel for Virginia Electric and Power
Company, d/b/a Dominion Energy North
Carolina*

John D. Little
Staff Attorney
Public Staff – N.C. Utilities Commission
4326 Mail Service Center
Raleigh, NC 27699-4300
john.little@psncuc.nc.gov

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing *Joint Motion to Excuse Witnesses*, as filed in Docket No. E-22, Sub 590, was served via electronic delivery or mailed, first-class, postage prepaid, upon all parties of record.

This, the 10th day of November, 2020.

/s/Mary Lynne Grigg

Mary Lynne Grigg
McGuireWoods LLP
501 Fayetteville Street, Suite 500
PO Box 27507 (27611)
Raleigh, North Carolina 27601
Telephone: (919) 755-6573
mgrigg@mcguirewoods.com

*Attorney for Virginia Electric and Power
Company, d/b/a Dominion Energy North
Carolina*