

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION  
DOCKET NO. E-100, SUB 194

In the Matter of: )  
Biennial Determination of Avoided )  
Cost Rates for Electric Utility ) **JOINT MOTION FOR EXTENSION**  
Purchases from Qualifying ) **OF TIME**  
Facilities – 2023 )

NOW COME the Southern Alliance for Clean Energy (SACE), the North Carolina Sustainable Energy Association (NCSEA), and the Carolinas Clean Energy Business Association (CCEBA) (collectively, Joint Movants) pursuant to Commission Rule R1-7 and move the North Carolina Utilities Commission (Commission) for an extension of time of 14 days, through and including February 21, 2024 for parties to file initial comments pursuant to the Commission’s August 7, 2023 Order Establishing Biennial Proceeding, Requiring Data, and Scheduling Public Hearing (Order) and also for an extension of time through and including March 27, 2024 for parties to file reply comments pursuant to the Order. In support of this motion, Joint Movants show the Commission as follows:

1. On August 7, 2023, the Commission issued the Order, which set the deadline for parties to file initial comments in this proceeding on February 7, 2024 and for parties to file reply comments in this proceeding on March 13, 2024.
2. After Duke Energy Progress, LLC and Duke Energy Carolinas, LLC (collectively, Duke) files the updated portfolio or portfolios (collectively, portfolio P4) of its proposed Carbon Plan and integrated resources plan (CPIRP) (Docket

No. E-100, Sub 190) on or before January 31, 2024, Duke expects to file updated avoided cost calculations based on portfolio P4 on or about February 28.

3. Parties should have the opportunity, at a minimum, to comment on Duke's updated avoided cost calculations based on portfolio P4.

4. There is insufficient time between the filing of P4 in the CPIRP proceeding on or around January 31 and the current February 7 deadline for initial comments for Duke to prepare updated avoided cost calculations, let alone for parties to take discovery and comment on them.

5. There is no impending statutory deadline to issue a final order establishing new avoided cost rates.

6. In order to fully review the avoided cost rates, Joint Movants would prefer an extension of time for initial comments of 30 days after the date that Duke files its updated, P4-based proposed avoided cost rates—which would allow a short window to take discovery and incorporate the results into initial comments—or at a minimum a flat 30-day extension of both initial and reply comment deadlines.

7. After conferring with the parties, Joint Movants understand that some would oppose an extension of that length, and Joint Movants are mindful of the Commission's calendar approaching significant dates in the CPIRP proceeding.

8. Taking these factors into consideration, Joint Movants propose the 14-day extension requested herein, which should allow time for a brief review of the updated, P4-based avoided cost rates before reply comments are due.

9. In addition, counsel for Joint Movants are all involved in the CPIRP proceeding which is expecting a major filing from Duke on January 31, as well as other proceedings before the Commission, and a 14-day extension will allow counsel for Joint Movants to more thoroughly prepare initial comments.

10. The Attorney General's Office supports this proposed extension.

11. The Public Staff, Duke, Western Carolina University and New River Light and Power, and Carolina Industrial Group for Fair Utility Rates I (CIGFUR I), the Carolina Industrial Group for Fair Utility Rates II (CIGFUR II), and the Carolina Industrial Group for Fair Utility Rates III (CIGFUR III) (together with CIGFUR I and CIGFUR II, CIGFUR) do not object to a two-week extension.

12. Dominion Energy North Carolina (DENC) takes no position on the motion, but asks that if the Commission grants the motion, the order state that discovery on DENC's Nov. 1, 2023 Initial Statement and Exhibits not be extended beyond the original schedule.

WHEREFORE, Joint Movants request an extension of time of 14 days, through and including February 21, 2024 for parties to file initial comments, and through and including March 27, 2024 for parties to file reply comments.

Respectfully submitted this 29th day of January, 2024.

/s/ Nicholas Jimenez

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CERTIFICATE OF SERVICE

I certify that all parties of record on the service list have been served with the foregoing filing either by electronic mail or by deposit in the U.S. Mail, postage prepaid.

This the 29th day of January, 2024.

/s/ Nick Jimenez  
Nick Jimenez