STATE OF NORTH CAROLINA UTILITIES COMMISSION RALEIGH

DOCKET NO. E-100, SUB 147

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of
2017 Biennial Integrated Resource) MOTION TO AUTHORIZE
Plan Updates and Related 2017) COMBINE REPORT ON
REPS Compliance Plans) IRP UPDATES AND COMMENTS ON
REPS COMPLIANCE PLANS

NOW COMES THE PUBLIC STAFF – North Carolina Utilities Commission (Public Staff), by and through its Executive Director, Christopher J. Ayers, and moves for an order that (1) authorizes the Public Staff to file its report pursuant to R8-60(k) stating whether the 2017 total system integrated resource plan (IRP) updates of Dominion Energy North Carolina (DENC), Duke Energy Progress (DEP), and Duke Energy Carolinas (DEC) (collectively "the utilities") meet the requirements of Commission Rule R8-60(j); (2) authorizes the Public Staff to file combined comments on the 2017 Renewable Energy and Energy Efficiency Portfolio Standard (REPS) compliance plans of the utilities; and (3) designates Tuesday, October 31, 2017, as the deadline for filing the combined comments for both the Rule R8-60(j) and REPS compliance plans. In support of this motion, the Public Staff respectfully shows unto the Commission:

1. Under Commission Rules R8-60(h)(2) and (4), the utilities must file IRP updates in each odd-numbered year. Each IRP update must include the utility's REPS compliance plan for the year of filing and the two following years. Under Rule R8-60(l), the Public Staff must file a report within 60 days

"whether [the] utility's update report meets the requirements of this rule," as well as comments on the utility's REPS compliance plan.

- 2. DENC filed its 2017 IRP update on May 1, 2017, and the IRP updates of DEC and DEP are due to be filed by September 1, 2017. Accordingly, the Public Staff's report on the DEC and DEP IRP updates are currently due on October 31, 2017. The report on DENC's IRP update was due on July 1, 2017.
- 3. Due to the press of business, the Public Staff did not file its report on DENC's update within 60 days of its filing. The Public Staff expects that on or before the existing deadline dates for DEP and DEC, it will be able to file its report on whether DENC's update meets the requirements of R8-60, as well as its comments on DENC's REPS Compliance Report.
- 4. The Public Staff believes it will more efficient for the Commission to receive reports on each utility's IRP update and comments on the REPS compliance plans in two combined filings. Therefore, the Public Staff proposes to file a combined report on the IRP updates and combined comments on the REPS compliance plans for DEC, DEP, and DENC on October 31, 2017.
- 5. The Public Staff has contacted DEC, DEP, and DENC, and none of them have objected to the filing procedure and deadline proposed herein.

WHEREFORE, the Public Staff prays:

 That the Commission authorize the Public Staff to file a combined report on the IRP updates and combined comments on the REPS compliance plans of DEC, DEP, and DENC;

- 2. That the Commission designate Tuesday, October 31, 2017, as the deadline for these filings; and
- 3. For such other and further relief as the Commission may deem just and proper.

This the 10th day of August, 2017.

PUBLIC STAFF
Christopher J. Ayers
Executive Director

David Drooz Chief Counsel

Electronically submitted /s/ Robert B. Josey, Jr Staff Attorney

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CERTIFICATE OF SERVICE

I certify that a copy of this Motion to Authorize Combined Report on IRP Updates and Comments on REPS Compliance Plans has been served on all parties of record or their attorneys, or both, by United States mail, first class or better; by hand delivery; or by means of facsimile or electronic delivery upon agreement of the receiving party.

This the 10th day of August, 2017.

Electronically submitted /s/ Robert B. Josey, Jr.