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August 28, 2020

## **VIA ELECTRONIC FILING**

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

Re: Duke Energy Carolinas, LLC; Duke Energy Progress, LLC and Dominion Energy North Carolina's Joint Motion for Extension of

Time

**Docket No. E-100, Sub 158** 

Dear Ms. Campbell:

Enclosed for filing in the above-referenced docket is Duke Energy Carolinas, LLC; Duke Energy Progress, LLC and Dominion Energy North Carolina's Joint Motion for Extension of Time.

If you have any questions, please do not hesitate to contact me.

Sincerely,

Kendrick C. Fentress

Kendrick C. Sertons

cc: Parties of Record

Enclosure

## BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

DOCKET NO. E-100, SUB 158

	)	JOINT MOTION FOR
In the Matter of	)	EXTENSION OF TIME OF DUKE
Biennial Determination of Avoided Cost	)	ENERGY CAROLINAS, LLC,
Rates for Electric Utility Purchases from	)	DUKE ENERGY PROGRESS,
Qualifying Facilities – 2018	)	LLC, AND DOMINION ENERGY
	)	NORTH CAROLINA

NOW COME Duke Energy Carolinas, LLC ("DEC"), Duke Energy Progress, LLC ("DEP," and together with DEC, "Duke") and Virginia Electric and Power Company, d/b/a Dominion Energy North Carolina ("DENC," and together with Duke, "Joint Movants"), pursuant to Rule R1-7 of the Rules and Regulations of the North Carolina Utilities Commission ("Commission") and move the Commission for an extension of time through and including September 16, 2020, for Joint Movants to file their report on the results of the stakeholder process as provided for in the Commission's April 15, 2020 *Order Establishing Standard Rates and Contract Terms for Qualifying Facilities*.

In support of the foregoing, the Joint Movants show the Commission the following:

1. On April 15, 2020, the Commission issued an *Order Establishing Standard Rates and Contract Terms for Qualifying Facilities* (the "April 15 Order") in the above-referenced docket, requiring the Joint Movants to organize a stakeholder group to address the addition of storage at existing qualifying facilities and to file a report of the results of that stakeholder process on or before September 1, 2020. The April 15 Order also directed the Public Staff, to the extent it does not agree with any of the recommendations in the report, to file a separate report setting forth its recommendations on September 1, 2020.

- 2. The Joint Movants have been working diligently to prepare the report of the results of the stakeholder process and, last week, have shared a draft with the other stakeholders for review to facilitate reporting on areas of consensus. Due to the press of other business, however, Duke and DENC require additional time to collect comments of the other stakeholders, including the Public Staff, and incorporate them into the report.
- 3. Based on the foregoing, the Joint Movants request an extension of time up to and including September 16, 2020, to file their report of the results of the stakeholder process in this proceeding.
- 4. To the extent that the Public Staff will also file a separate report, the Joint Movants propose that the Commission extend the deadline for that filing up to and including September 16, 2020.
  - 5. The requested extension will not result in prejudice to any party.
- 6. Counsel for the Joint Movants have contacted counsel for all parties of record regarding this Motion, and no party has advised that it objects.

WHEREFORE, Duke Energy Carolinas, LLC, Duke Energy Progress, LLC, and Dominion Energy North Carolina respectfully request that the Commission grant this Motion for an extension of time through and including Wednesday, September 16, 2020, for Joint Movants and the Public Staff to file reports on the stakeholder process in this proceeding and, such other relief as the Commission deems just and proper.

## Respectfully submitted, this the 28th day of August, 2020.

/s/ Andrea R. Kells

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Attorney for Virginia Electric and Power Company, d/b/a Dominion Energy North Carolina Kendrik C. derstress

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## **CERTIFICATE OF SERVICE**

I certify that a copy of Duke Energy Carolinas, LLC; Duke Energy Progress, LLC and Dominion Energy North Carolina's Joint Motion for Extension of Time, in Docket No. E-100, Sub 158, has been served by electronic mail, hand delivery, or by depositing a copy in the United States Mail, 1<sup>st</sup> Class Postage Prepaid, properly addressed to parties of record.

This the 28th day of August, 2020.

Kendrick C. Fentress

Associate General Counsel

Kendrick C. Sertress

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