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N.C. Utilities Commission

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August 6, 2010

Ms. Renné Vance
North Carolina Utilities Commission
4325 Mail Service Center
Raleigh, NC 27699-4325

**RE: Docket No. E-100, Sub 113
Docket No. E-100, Sub 121**

Dear Ms. Vance:

Enclosed for filing in the above-referenced docket are the original and 30 copies of the Joint Motion of North Carolina Eastern Municipal Power Agency, North Carolina Municipal Power Agency Number 1, Progress Energy Carolinas, Inc., Duke Energy Carolinas LLC, and North Carolina Electric Membership Corporation. Please file-stamp and return the additional two copies provided via our courier.

Thank you for your assistance, and please let us know if you have any questions regarding this submission.

Sincerely yours,



Christopher J. Ayers

Enclosure

cc: Parties of Record

Cherles
AL
7 Lomm
Bennink
Kirby
Watson
Hoover
Kite
Hilburn
Sessions
Ericson
Jones
ExDir
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BEFORE THE
NORTH CAROLINA UTILITIES COMMISSION
RALEIGH

DOCKET NO. E-100, SUB 113
DOCKET NO. E-100, SUB 121

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|------------------------------------|---|---|
| DOCKET NO. E-100, SUB 113 |) | |
| |) | |
| In the Matter of |) | |
| Rulemaking Proceeding to Implement |) | JOINT MOTION OF NORTH CAROLINA |
| Session Law 2007-397 |) | EASTERN MUNICIPAL POWER AGENCY, |
| |) | NORTH CAROLINA MUNICIPAL POWER |
| AND |) | AGENCY NUMBER 1, PROGRESS ENERGY |
| |) | CAROLINAS, INC., DUKE ENERGY |
| DOCKET NO. E-100, SUB 121 |) | CAROLINAS LLC, AND NORTH |
| |) | CAROLINA ELECTRIC MEMBERSHIP |
| In the Matter of |) | CORPORATION FOR EXTENSION OF |
| Implementing a Tracking System for |) | TIME |
| Renewable Energy Certificates |) | |
| Pursuant to Session Law 2007-397 |) | |

NOW COMES, North Carolina Eastern Municipal Power Agency ("NCEMPA"), and North Carolina Municipal Power Agency Number 1 ("Agency 1" and together with NCEMPA, the "Power Agencies"), Progress Energy Carolinas, Inc. ("Progress"), Duke Energy Carolinas LLC ("Duke"), and North Carolina Electric Membership Corporation ("NCEMC"), (collectively, the "Electric Suppliers"), through their respective attorneys, in response to the Order Requesting Comments on Modifications to Rules R8-64 Through R8-69 and Interim Operating Procedures for NC-RETS (the "Order"), issued by the North Carolina Utilities Commission ("Commission") on August 3, 2010, and move the Commission for an extension of time for the Electric Suppliers and all other parties to this Docket to file initial comments to on or before September 20, 2010. In support of this Motion, the Electric Suppliers show the following:

1. By its Order issued on September 4, 2009, in Docket No. E-100, Sub 113, the Commission invited interested parties to propose amendments to Commission Rules R8-64

through R8-69 for the purpose of streamlining the administration of the Renewable Energy and Energy Efficiency Portfolio Standards legislation enacted into law on August 20, 2007, as Session Law 2007-397 ("REPS" or "SB3"). After multiple extensions of time were granted by the Commission, the final deadline for filing such proposed amendments was March 1, 2010, and for filing reply comments was April 1, 2010. By its Order issued on January 27, 2010, in Dockets No. E-100, Subs 113 and 121, the Commission requested comments from interested parties by February 19, 2010, concerning the Commission's proposed amendments to Rule R8-67 regarding the participation of electric power suppliers and renewable energy facilities in NC-RETS. By suggestion of the Commission Staff during an NC-RETS Stakeholder meeting held February 25, 2010, the parties were invited to supplement their initial comments and some parties did so by filings made on March 5, 2010. Because the proposed rule changes to Rule R8-67 overlap with the parties proposed changes to streamline the administration of the REPS, the Commission is addressing both rulemaking efforts in its Order.

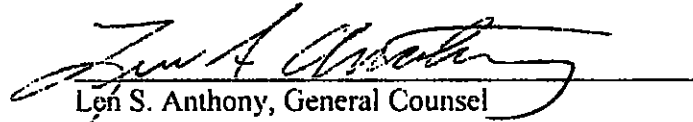
2. The Electric Suppliers respectfully request that the Commission extend the deadline for the filing of the parties' comments to the Order to on or before September 20, 2010, so that all parties to this Docket will have sufficient time to adequately review, consider and comment on the 80 pages of commentary and 42 pages of appendices that comprise the Order. The Order contains a number of technical, procedural, and administrative issues regarding the administration of REPS and the implementation and administration of NC-RETS that are of significant importance to the Electric Suppliers and the Electric Suppliers believe that the twelve (12) working days allotted by the Commission is not sufficient enough time to adequately consider, study and comment on these important issues. In addition, the Order contains proposed amendments that were not suggested in the parties' comments and, therefore, are being reviewed

by the parties for the first time. Finally, the extension requested herein will not impair or prejudice the administration of REPS or implementation or administration of NC-RETS.

WHEREFORE, the Electric Suppliers move the Commission to extend the deadline for the Electric Suppliers and all other parties to this Docket to file their initial comments to the Order to on or before September 20, 2010.

Respectfully submitted, this 6th day of August, 2010.

PROGRESS ENERGY CAROLINAS, INC.

A handwritten signature in black ink, appearing to read "Len S. Anthony", is written over a horizontal line.

Len S. Anthony, General Counsel

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DUKE ENERGY CAROLINAS, LLC

A handwritten signature in black ink, appearing to read "Charles A. Castle", is positioned above a horizontal line.

Charles A. Castle

Senior Counsel

Duke Energy Corporation

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Charlotte, NC 28202

**NORTH CAROLINA ELECTRIC
MEMBERSHIP CORPORATION**

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N. C. Electric Membership Corporation
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NORTH CAROLINA EASTERN
MUNICIPAL POWER AGENCY,
NORTH CAROLINA MUNICIPAL
POWER AGENCY NUMBER 1



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CERTIFICATE OF SERVICE

It is hereby certified that the foregoing document has been served upon all parties of record by depositing copies thereof in the United States mail, first class postage prepaid.

This 6th day of August, 2010.

A handwritten signature in black ink, appearing to read 'Chris Ayers', is written over a horizontal line.

Christopher J. Ayers